

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 9

IN THE MATTER OF: ) Docket No. RCRA-09-92-0012  
)  
Hughes Aircraft Company )  
EPA ID No. )  
CAD 041 666 819, )  
)  
Respondent )

ANSWER AND AFFIRMATIVE DEFENSES OF RESPONDENT  
HUGHES AIRCRAFT COMPANY

Respondent Hughes Aircraft Company ("Hughes"), by its attorneys, Gary L. Rafferty, Corporate Staff Counsel, and Honigman Miller Schwartz and Cohn, answers the United States Environmental Protection Agency's ("EPA") July 31, 1992 Determination of Violation, Compliance Order, and Notice of Right to Request a Hearing (the "Complaint") as follows:

A. INTRODUCTION

1. Except as to the allegations contained into the last two sentences of paragraph 1, the allegations of paragraph 1 are conclusions of law and do not require an answer. To the extent that an answer is required, Hughes is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph, except to admit: (i) that Hughes is a Delaware corporation; (ii) the identity of the Complainant; and (iii) that Hughes is the Respondent in this matter.

2. Hughes admits the allegations of paragraph 2.

3. The allegations of paragraph 3 are conclusions of law and do not require an answer. To the extent that an answer is required, Hughes is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph, except to deny as untrue the allegations that Hughes has violated or is in violation of the law to the extent alleged in the Complaint.

B. JURISDICTION

4. The allegations of paragraph 4 are conclusions of law and do not require an answer. To the extent that an answer is required, Hughes is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph.

5. The allegations of paragraph 5 are conclusions of law and do not require an answer. To the extent that an answer is required, Hughes is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph.

6. The allegations of paragraph 6 are conclusions of law and do not require an answer. To the extent that an answer is required, Hughes is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph.

7. The allegations of paragraph 7 are conclusions of law and do not require an answer. To the extent that an answer is required, Hughes is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph.

8. The allegations of paragraph 8 are conclusions of law and do not require an answer. To the extent that an answer is required, Hughes is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph.

9. Hughes admits the allegations of paragraph 9.

10. Hughes admits that it submitted a Part A permit application ("Part A") under the Resource Conservation and Recovery Act ("RCRA"), as amended, 42 U.S.C. 6901 et seq., but denies as untrue the allegation in paragraph 10 that the Part A was submitted on or about November 1, 1980, because the Part A was submitted on or about November 5, 1980, as alleged by EPA in paragraph 23. Further answering, Hughes neither admits nor denies the remaining allegations of this paragraph for the reason that the document referred to speaks for itself and denies as untrue such allegations to the extent contrary to said document.

11. The allegations of paragraph 11 are conclusions of law and do not require an answer. To the extent that an answer is required, Hughes admits that the Facility obtained interim status and denies as untrue the remaining allegations of this paragraph.

12. The allegations of paragraph 12 are conclusions of law and do not require an answer. To the extent that an answer is required, Hughes is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph.

13. The allegations of paragraph 13 are conclusions of law and do not require an answer. To the extent that an answer is required, Hughes is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph.

14. The allegations of paragraph 14 are conclusions of law and do not require an answer. To the extent that an answer is required, Hughes is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph.

15. Hughes admits that the Interim Status Document ("ISD") was issued on January 15, 1982 (effective December 16, 1981) as alleged in paragraph 15 of the Complaint. Hughes neither admits nor denies the remaining allegations of this paragraph which address the issuing entity and the provisions of the ISD for the reason that the document referred to speaks for itself and denies as untrue such allegations to the extent contrary to said document. Further answering, the remaining allegations of this paragraph are conclusions of law and do not require an answer. To the extent that an answer is required to such remaining allegations, Hughes is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph.

16. Hughes neither admits nor denies the allegations of paragraph 16 which address the provisions of the ISD for the reason that the document referred to speaks for itself and denies as untrue such allegations to the extent contrary to said document. Further answering, the remaining allegations of this paragraph are conclusions of law and do not require an answer. To the extent that an answer is required, Hughes is without knowledge or information sufficient to form a belief as to the truth of such remaining allegations, except that Hughes denies as untrue the allegations that the ISD or Sections 25159.5(b) and 25159.6 of the California Health and Safety Code require Hughes to comply with the federal RCRA regulations. See In the Matter of Union Oil Company of California, No. RCRA-09-84-0223 (January 14, 1985).

17. The allegations of paragraph 17 are conclusions of law and do not require an answer. To the extent that an answer is required, Hughes is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph.

18. The allegations of paragraph 18 are conclusions of law and do not require an answer. To the extent that an answer is required, Hughes denies as untrue the allegations of this paragraph to the extent that the allegations pertain to the time period when the State of California was authorized to implement its state program in lieu of RCRA. Further answering, Hughes states that it has only been required to comply with the federal RCRA regulations during time periods when the State of California has not been authorized to implement its state program in lieu of RCRA.

19. The allegations of paragraph 19 are conclusions of law and do not require an answer. To the extent that an answer is required, Hughes is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph.

20. Except for the allegations concerning EPA's evaluation of various documents, the allegations of paragraph 20 are conclusions of law and do not require an answer. To the extent that an answer is required and as to the allegations concerning EPA's evaluation of various documents, Hughes is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph. Further answering, Hughes denies as untrue the allegations that it has violated California law, RCRA, or the RCRA regulations.

21. The allegations of paragraph 21 are conclusions of law and do not require an answer. To the extent that an answer is required, Hughes is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph. Further answering, Hughes denies as untrue the allegation that it has violated California law, RCRA, or the RCRA regulations.

22. The allegations of paragraph 22 are conclusions of law and do not require an answer. To the extent that an answer is required, Hughes is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph.

C. STATEMENT OF FACTS

23. Hughes admits that it filed a Part A on or about November 5, 1980, and neither admits nor denies the remaining allegations of paragraph 23 for the reason that the document referred to speaks for itself and denies as untrue such allegations to the extent contrary to said document.

24. Hughes admits that it received a request for information dated March 25, 1991, and that, on May 2, 1991, Hughes provided a response to that request. Hughes neither admits nor denies the remaining allegations of this paragraph for the reason that the documents referred to speak for themselves and denies as untrue such allegations to the extent contrary to said documents. Further answering, Hughes states that Tank #2 was located adjacent to, not enclosed within, Building 231.

D. VIOLATIONS

COUNT I

25. For its answer to the allegations of paragraph 25, Hughes repeats its answers to the allegations of paragraphs 1 through 24.

26. Hughes neither admits nor denies the allegations of paragraph 26 for the reason that the Code of Federal Regulations speaks for itself as to the subject matter thereof and denies as untrue such allegations to the extent contrary to the Code of Federal Regulations. To the extent that an answer is required, Hughes is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph. Further answering, Hughes states that: (i) the requirements of 40 C.F.R. 265.112(c) are inapplicable to the Facility; and (ii) even if such regulation applied to the Facility, the regulation does not require the submission of a closure plan for a unit replacement or a partial closure that only addresses tanks and container storage areas.

27. Hughes neither admits nor denies the allegations of paragraph 27 for the reason that the document referred to speaks for itself and denies as untrue such allegations to the extent contrary to said document. Further answering, Hughes states that Section V.2.c of the ISD does not require the submission of a closure plan for a unit replacement or a partial closure that only addresses tanks and container storage areas.

28. Hughes denies as untrue the allegations of paragraph 28 for the reasons that: (i) the referenced units were not closed, but were removed and replaced; and (ii) if the units were closed, only a partial closure of the Facility occurred.



29. Hughes denies as untrue the allegations of paragraph 29 for the same reasons as set forth in the answer to paragraph 28 and further because Hughes has submitted closure plans for the units.

30. The allegations of paragraph 30 are conclusions of law and do not require an answer. To the extent that an answer is required, Hughes denies as untrue the allegations of paragraph 30.

#### COUNT II

31. For its answer to the allegations of paragraph 31, Hughes repeats its answers to the allegations of paragraphs 1 through 24.

32. Hughes neither admits nor denies the allegations of paragraph 32 for the reason that the Code of Federal Regulations speaks for itself as to the subject matter thereof and denies as untrue such allegations to the extent contrary to the Code of Federal Regulations. To the extent that an answer is required, Hughes is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph. Further answering, Hughes states that the requirements of 40 C.F.R. 270.71 were inapplicable to the Facility during the relevant time period for the reason that the State of California was authorized to implement its state program in lieu of RCRA.

33. Hughes neither admits nor denies the allegations of paragraph 33 for the reason that the Code of Federal Regulations speaks for itself as to the subject matter thereof and denies as untrue such allegations to the extent contrary to the Code of Federal Regulations. To the extent that an answer is required, Hughes is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph. Further answering, Hughes states that the requirements of 40 C.F.R. 270.72 were inapplicable to the Facility during the relevant time period for the reason that the State of California was authorized to implement its state program in lieu of RCRA.

34. Hughes neither admits nor denies the allegations of paragraph 34 for the reason that the document referred to speaks for itself and denies as untrue such allegations to the extent contrary to said document. Further answering, Hughes states that Section I.4.c of the ISD does not prohibit the replacement of the tanks and container storage areas as was involved in this matter.

35. Hughes admits the allegations of paragraph 35.

36. Hughes denies as untrue the allegations of paragraph 36. Further answering, Hughes states that EPA has admitted in the penalty calculation of each Count of the Complaint that "a state agency may have had some knowledge of [Hughes'] activities."

37. Hughes admits the allegations of paragraph 37. Further answering, Hughes states that: (i) the processes, storage in tanks and containers, are identified in Hughes' Part A; (ii) the capacities of the Current Solvent Tank and the Current Container Storage Yard are less than the capacities identified for tank and container storage, respectively, in the Part A; and (iii) the units identified in paragraph 37 were replacements for previously existing units.

38. The allegations of paragraph 38 are conclusions of law and do not require an answer. To the extent that an answer is required, Hughes denies as untrue the allegations of this paragraph for the reasons that: (i) the RCRA regulations did not apply to the Facility at the time of replacement because during the relevant time period the State of California was authorized to implement its state program in lieu of RCRA; (ii) the processes used at the Facility were not changed as a result of replacement of the units; (iii) such replacement was not a substantial modification or addition to the Facility; and (iv) such replacement did not involve changes requiring authorizations or approvals.

#### COUNT III

39. For its answer to the allegations of paragraph 39, Hughes repeats its answers to the allegations of paragraphs 1 through 24.

40. Hughes neither admits nor denies the allegations of paragraph 40 for the reason that the Code of Federal Regulations speaks for itself as to the subject matter thereof and denies as untrue such allegations to the extent contrary to the Code of Federal Regulations. To the extent that an answer is required, Hughes is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph. Further answering, Hughes states that the requirements of 40 C.F.R. 265.111: (i) were inapplicable to Facility because during the relevant time period the State of California was authorized to implement its state program in lieu of RCRA; and (ii) only apply to the closure of facilities and not to unit replacements or the partial closure of tanks and container storage areas.

41. Hughes neither admits nor denies the allegations of paragraph 41 for the reason that the document referred to speaks for itself and denies as untrue such allegations to the extent contrary to said document. Further answering, Hughes states that Section V.1.b of the ISD does not apply to unit replacement or to the partial closure of tanks and container storage areas.

42. Hughes denies as untrue the allegations of paragraph 42 for the reasons that: (i) the referenced units were not closed, but were removed and replaced; and (ii) if the units were closed, only a partial closure of the Facility occurred.

43. Hughes denies as untrue the allegations of paragraph 43 that it closed Tanks #1 and #2 for the reasons as set forth in the answer to paragraph 42. Hughes admits that it received information alleged in this paragraph regarding the concentration of compounds in the soil and groundwater.

44. Hughes admits that it submitted a Part A on or about November 5, 1980, and neither admits nor denies the remaining allegations of paragraph 44 for the reasons that: (i) the Part A referred to speaks for itself and denies as untrue such allegations to the extent contrary to said Part A; and (ii) the Code of Federal Regulations speaks for itself as to the subject matter thereof and specifically as to the compounds that may be found in the waste codes F003 and F005.

45. Hughes admits that it received information on October 25, 1991, that suggests that the soil and groundwater may be contaminated at the Facility, but denies as untrue the allegation of paragraph 45 that the information reveals that contamination was migrating or that Tank #1 was the source of the contamination.

46. The allegations of paragraph 46 are conclusions of law and do not require an answer. To the extent that an answer is required, Hughes denies as untrue the allegations of this paragraph for the reasons that: (i) the RCRA regulations did not apply to the Facility at the time of the replacement because the State of California was authorized to implement its state program in lieu of RCRA; and (ii) the requirements of 40 C.F.R. 265.111 are not triggered by unit replacement or the partial closure of a facility, but rather are only triggered by the closure of a facility.

D. CIVIL PENALTY

47. For the reasons set forth above and in the affirmative defenses below, Hughes denies as untrue the allegations that EPA is entitled to assess any penalty with respect to the matters. Further answering, Hughes states that to the extent a penalty may properly be assessed, because of substantial confusion in the application and meaning of applicable requirements and other mitigating factors as specified in 42 U.S.C. §6928(a)(3) and EPA's RCRA Civil Penalty Policy (1990), no more than a nominal penalty assessment would be appropriate in this case.

AFFIRMATIVE DEFENSES

1. The Complaint fails to state a claim upon which relief can be granted.
2. The Complaint is barred, in whole or part, by the applicable statute of limitations.

3. EPA cannot bring an action for failure to comply with the RCRA regulations because such regulations were inapplicable to the Facility during the time period relevant to the Complaint for the reason that the State of California was authorized to implement its state program in lieu of RCRA and that state program did not require compliance with the RCRA regulations.

4. The Facility was not required to meet closure requirements alleged in the Complaint under RCRA or California law because the activities were a unit replacement or a partial closure, neither of which is subject to closure requirements alleged to have been violated in the Complaint.

5. The removal and replacement of the tanks and container storage areas was not a "substantial modification or addition" to the Facility.

6. The removal and replacement of the tanks and container storage areas was not a change in "processes" at the Facility.

7. A recent federal court decision, Shell Oil Co. v. EPA, 950 F. 2d 741 (D.C. Cir 1991), invalidating the "mixture" and "derived-from" rules in 40 C.F.R. 261.3 precludes EPA from claiming that the tanks and container storage areas contained hazardous wastes as defined under RCRA.

8. EPA is estopped from bringing this action and/or from assessing penalties for the activities described in the Complaint because the State of California has tacitly and/or expressly approved of the activities.

9. Count III of the Complaint is not ripe because the closure standard in 40 C.F.R. 265.111 only applies at the closure of a facility, not at the time of unit replacement or partial closure.

10. Hughes has complied or substantially complied with the provisions of 40 C.F.R. Part 265 and the ISD, and any noncompliance therewith was minor in extent and duration and any such non-compliance was due either to an honest mistake or EPA's and/or the State of California's failure to adequately explain the the application and implementation of said regulations and the ISD.

11. Enforcement of the RCRA regulations or the provisions of the ISD under the circumstances present here would violate the due process and equal protection clauses of the United States Constitution.

12. EPA has arbitrarily and capriciously selected Hughes as an enforcement target and has not enforced RCRA in this and other cases in an even-handed and fair matter.

13. Hughes reserves the right to assert additional affirmative defenses at any time prior to the completion of the hearing in this cause.

WHEREFORE, Hughes requests that the Complaint be dismissed.



#### COMPLIANCE ORDER

For the reasons set forth above, Hughes denies that EPA is entitled to the relief mandated. Further answering, Hughes states that the Due Process Clause of the Fifth Amendment to the United States Constitution prohibits EPA from requiring implementation the Compliance Order prior to providing a hearing to Hughes. In addition, RCRA does not authorize EPA to require the payment of penalties under the Compliance Order prior to a hearing being held.

#### REQUEST FOR HEARING

In accordance with 42 U.S.C. 6928(b) and 40 C.F.R. Part 22, Hughes requests a hearing to contest the allegations of the Complaint, the Compliance Order (and any compliance schedule contained therein) and the penalty assessed, and to assert the affirmative defenses stated above.

SETTLEMENT CONFERENCE

Hughes hereby requests an informal settlement conference with EPA regarding the matters alleged in the Complaint.

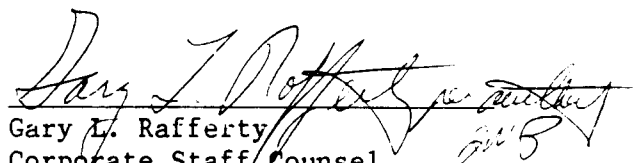
Respectfully submitted,

Hughes Aircraft Company.

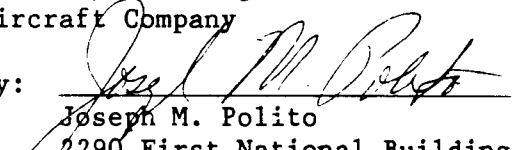
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Dated: September 2, 1992

A30461

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 9


IN THE MATTER OF:	)	<u>Docket No. RCRA-09-92-0012</u>
	)	
Hughes Aircraft Company	)	
EPA ID No.	)	
CAD 041 666 819,	)	
	)	
Respondent	)	

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Answer and Affirmative Defenses of Respondent, Hughes Aircraft Company, dated September 2, 1992, was sent this day, via Federal Express, to the addressees listed below:

Regional Hearing Clerk  
United States Environmental Protection Agency, Region IX  
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FILED

JUL 31 1992

UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION IX

JUL 31 1992

Regional Hearing  
Clerk  
J.C.

In the matter of	)	Docket No. RCRA-09-92-0012
	)	
Hughes Aircraft Company	)	
EPA ID No. CAD041666819	)	DETERMINATION OF VIOLATION
	)	COMPLIANCE ORDER
	)	AND
Respondent.	)	NOTICE OF RIGHT TO
	)	REQUEST A HEARING

DETERMINATION OF VIOLATION

A. INTRODUCTION

1. This is a civil administrative enforcement action instituted pursuant to Section 3008(a)(1) of the Resource Conservation and Recovery Act ("RCRA"), as amended, 42 U.S.C. §6928(a)(1), and the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, 40 C.F.R. Part 22. Complainant is the United States Environmental Protection Agency, Region IX ("EPA"). Respondent is Hughes Aircraft Company, a Delaware corporation ("Respondent").

2. Respondent operates a facility that engages in the manufacturing and processing of electronic components, and that is located at 3100 West Lomita Boulevard in Torrance, California, EPA Identification Number CAD041666819 (the "Facility").

3. This Determination of Violation, Compliance Order and Notice of Right to Request a Hearing ("Complaint") serves as notice that EPA, on the basis of information available to it, has determined that Respondent is in violation of Section 3004 and 3005 of RCRA, 42 U.S.C. §§ 6924 and 6925, and regulations adopted pursuant thereto.

B. JURISDICTION

4. Respondent is a "person" as defined in Section 1004(15) of RCRA, 42 U.S.C. §6903(15), and 40 C.F.R. §§ 260.10 and 270.2.

5. Respondent is a "generator" of hazardous waste as defined in 40 C.F.R. §260.10.

6. Respondent generates, treats, and stores, or has generated, treated, and stored, "hazardous waste" as defined in Section 1004(5) of RCRA, 42 U.S.C. §6903(5), and 40 C.F.R. §§ 260.10 and 261.3.
7. The Facility is an "existing hazardous waste management facility" as defined in 40 C.F.R. §§ 260.10 and 270.2.
8. Respondent is the "operator" of a facility as defined in 40 C.F.R. §§ 260.10 and 270.2.
9. On or about August 12, 1980, pursuant to Section 3010 of RCRA, 42 U.S.C. §6930, Respondent submitted to EPA a Notification of Hazardous Waste Activity.
10. On or about November 1, 1980, pursuant to Section 3005 of RCRA, 42 U.S.C. §6925, and 40 C.F.R. §270.10(a), Respondent submitted to EPA the Part A of the Facility's RCRA Permit Application for storage and treatment of hazardous waste (the "Part A").
11. The Facility obtained interim status for the hazardous waste management units described in its Part A pending final administrative disposition of its permit application pursuant to Section 3005(e) of RCRA, 42 U.S.C. §6925(e).
12. On June 4, 1981, EPA awarded to the State of California Phase I Interim Authorization to administer the RCRA hazardous waste program as provided by Section 3006(b) (1) of RCRA, 42 U.S.C. §6926(b) (1) and 40 C.F.R. Part 271, Subpart B (formerly Part 123, Subpart F).
13. On January 11, 1983, EPA awarded to the State of California Phase II-A Interim Authorization to administer the RCRA hazardous waste program as provided by Section 3006(b) (1) of RCRA, 42 U.S.C. §6926(b) (1) and 40 C.F.R. Part 271, Subpart B (formerly Part 123, Subpart F).
14. Interim authorization required, inter alia, that the State of California impose interim status standards upon hazardous waste management facilities, as required by Section 3005(e) of RCRA, 42 U.S.C. §6925(e).
15. On January 15, 1982 (effective December 16, 1981), the State of California Department of Health Services issued to the Respondent an Interim Status Document (the "ISD") which contained conditions of operation for the Facility, pursuant to Section 25200.5 of the California Health and Safety Code (H.S.C.).
16. Pursuant to General Condition 1.1 of the ISD and Sections 25159.5(b) and 25159.6 of the H.S.C., Respondent was required to meet the requirements of the federal regulations (inter alia, 40

C.F.R. Parts 265 and 270) adopted pursuant to Sections 3004 and 3005 of RCRA, 42 U.S.C. §§ 6924 and 6925.

17. On January 31, 1986, the State of California's interim authorization to administer the RCRA hazardous waste program expired (51 Fed. Reg. 4128 (January 31, 1986)).

18. Respondent is, therefore, subject to the federal regulations (inter alia, 40 C.F.R. Parts 265 and 270) adopted pursuant to Sections 3002, 3004 and 3005 of RCRA, 42 U.S.C. §§ 6922, 6924 and 6925.

19. Section 3008 of RCRA, 42 U.S.C. §6928, authorizes the Administrator, U.S. Environmental Protection Agency, to issue orders requiring compliance immediately or within a specified time for violation of any requirement of Subtitle C of RCRA, Section 3001 of RCRA et seq., 42 U.S.C. §6921 et seq.

20. EPA evaluated various documents supplied by Respondent, and on the basis of this evaluation has determined that Respondent has violated California's previously authorized hazardous waste program and Subtitle C of RCRA, specifically Sections 3004 and 3005 of RCRA, 42 U.S.C. §§6924 and 6925, and regulations adopted pursuant thereto, 40 C.F.R. Parts 265 and 270.

21. Respondent, in violating 40 C.F.R. Parts 265 and 270, has violated Subtitle C of RCRA and, therefore, is subject to the powers vested in the EPA Administrator by Section 3008 of RCRA, 42 U.S.C. §6928.

22. The Administrator has delegated the authority under Section 3008 of RCRA to the EPA Regional Administrator for Region IX, who has redelegated this authority to the Director of the Hazardous Waste Management Division.

### C. STATEMENT OF FACTS

23. On or about November 5, 1980, Respondent submitted to EPA the Part A of the RCRA permit application ("Part A") which identified the following hazardous waste management units: a) a storage tank referred to as Tank #1; b) a storage tank referred to as Tank #2; c) a storage yard (referred to herein at "Storage Yard #1") identified as "Waste Chem Storage"; and d) a storage yard (referred to herein as "Storage Yard #2") identified as Fenced Drum Waste Storage. A map (included in this Complaint as Attachment No. #1) included in the Part A located the units as follows: Tank #1--southeast of building #230; Tank #2--east of building #231; Storage Yard #1--between buildings #230 and #231; and Storage Yard #2--south of building #230 and east of building #231.

24. On March 25, 1991, pursuant to Section 3007(a), 42 U.S.C. §6927(a), EPA requested information from Respondent about the operating status and locations of Tank #1, Tank #2, Storage Yard #1, Storage Yard #2, and the location and operating status of any other hazardous waste management units at the Facility. On May 2, 1991 the Respondent identified Tank #1 as Former Tank #1, Tank #2 as Former Tank #2, Storage Yard #1 as Former Storage Yard #1, and Storage Yard #2 as Former Storage Yard #2. A map (included in this Complainant as Attachment No. #2) submitted by the Respondent and drawn after 1983 identifies the former site of Tank #1 ("Former Tank #1"), under a new building (building #232) and identifies the former site of Tank #2 ("Former Tank #2") enclosed within building #231. The location of a new tank (the "Current Solvent Tank") is adjacent to building #232. Storage Yards #1 and #2 have been removed and replaced with a new storage area (the "Current Container Storage Yard") located east of building #232.

D. VIOLATIONS

Count I

[Failure to Submit A Closure Plan]

25. Paragraphs 1 through 24 above are incorporated herein by this reference as if they were set forth here in their entirety.

26. 40 C.F.R. §265.112(c) requires the owner and operator of a hazardous waste management facility to submit a closure plan to the Regional Administrator at least 180 days prior to the date closure begins.

27. Section V.2.c. of the ISD required the Respondent to submit a Closure Plan to the California Regional Water Quality Control Board (CRWQCB) at least 180 days before the date closure is expected to begin.

28. On or about July 1, 1983 and June 24, 1983 Respondent closed four hazardous waste storage units--Tanks #1 and #2 and Storage Yards #1 and #2.

29. Respondent did not submit a closure plan to the CRWQCB 180 days prior to closure of the units described in Paragraph 28. To date, Respondent has not submitted a closure plan to the CRWQCB or the Regional Administrator for the closure of the units.

30. Therefore, by failing to submit a closure plan, Respondent has violated ISD Section V.2.c. and 40 C.F.R. §265.112(c).



### Count II

#### [Unauthorized Modifications and Additions to the Facility]

31. Paragraphs 1 through 24 above are incorporated herein by this reference as if they were set forth here in their entirety.
32. 40 C.F.R. §270.71 prohibits the owner and operator from employing processes not specified in the Part A of the RCRA permit application while the facility operates under interim status.
33. 40 C.F.R. §270.72 prohibits the owner and operator from making changes in the hazardous waste management operations at its facility except for specifically listed changes. 40 C.F.R. §270.72(a)(3) prohibits the owner and operator from changing the hazardous waste processes employed at its facility unless the owner and operator obtain the Director's approval for the change.
34. Section I.4.c. of the ISD prohibits Respondent from making substantial modifications and additions to the Facility.
35. On or about June 24, 1983 and July 1, 1983 the Respondent took the following actions: removed Tanks #1 and #2, installed a new tank in a new location (Current Solvent Tank), removed Storage Yards #1 and #2, and constructed a new storage yard (Current Container Storage Yard) at a different location.
36. Respondent did not seek nor receive approval for the changes outlined in Paragraph 35.
37. The Current Solvent Tank and Current Container Storage Yard were not in existence on November 19, 1980 and were not specified in Respondent's Part A of the RCRA permit applicaiton.
38. Therefore, by removing Tanks #1 and #2 and Storage Yards #1 and #2 and installing the Current Solvent Tank and the Current Container Storage Yard, Respondent made substantial modifications and additions to the Facility, changed the processes employed at the Facility, and made unauthorized changes to the hazardous waste management activites at the Facility, Respondent has violated ISD Section I.4.c. and 40 C.F.R. §§ 270.71 and 270.72.

### Count III

#### [Failure to Close In An Appropriate Manner]

39. Paragraphs 1 through 24 above are incorporated herein by this reference as if they were set forth here in their entirety.
40. 40 C.F.R. §265.111 requires the owner and operator to close the facility in a manner to control, minimize or eliminate the post-closure escape of hazardous waste or hazardous constituents to the extent necessary to protect human health and the environment.

41. Section V.1.b. of the ISD required Respondent to close the Facility in a manner to control, minimize or eliminate the post-closure escape of hazardous waste or hazardous constituents to the extent necessary to protect human health and the environment.

42. On or about July 1, 1983 and June 24, 1983 Respondent closed four hazardous waste storage units--Tanks #1 and #2 and Storage Yards #1 and #2.

43. On or about June 15, 1983 and August 29, 1983, following the closure of Tanks #1 and #2, Respondent received information that identified the following levels of hazardous constituents in subsurface soil where Tank #1 had previously been located: 440,000 ug/kg tetrachloroethylene, 19,000 ug/kg trichloroethylene, 18,000 ug/kg 1,1,1-trichloroethane, 520 ug/kg acetone 610 ug/kg ethyl benzene, and 1,200 ug/kg toluene. The following levels of volatile organic compounds were identified in shallow groundwater beneath the site of Tank #1: 65 ug/L trichloroethylene, 12 ug/L trichlorofluoromethane, 11 ug/L tetrachloroethylene, and 5 ug/L trichloroethane.

44. On or about November 5, 1980, Respondent submitted to EPA the Part A of the RCRA permit application and indicated under Part D (Processes) of this permit application that F003, F005, and F017 hazardous wastes were being stored in tanks. F003 hazardous wastes include acetone and ethyl benzene; F005 hazardous wastes include toluene.

45. On or about October 25, 1991, Respondent received additional information that revealed the likelihood that contamination that originated from Tank #1 was migrating away from the original site of Tank #1.

46. Therefore, by failing to close the Facility in a manner that protects human health and the environment, Respondent has violated 40 C.F.R. §265.111.

#### D. CIVIL PENALTY

47. Section 3008(g) of RCRA, 42 U.S.C. §6928(g), authorizes a civil penalty of up to TWENTY-FIVE THOUSAND DOLLARS (\$25,000.00) per day for each violation of Subtitle C of RCRA, 42 U.S.C. §6921 et seq. Based upon the facts alleged in this Complaint and upon those factors which the Complainant must consider pursuant to Section 3008(a)(3) of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. §6928(a)(3), and the RCRA Civil Penalty Policy, including the seriousness of the violations, any good faith efforts by the Respondent to comply with applicable requirements, and any economic benefit accruing to Respondent, as well as such other matters as justice may require, Complainant proposes that the Respondent be assessed THREE HUNDRED EIGHTY-ONE THOUSAND AND ONE

HUNDRED FIFTY DOLLARS (\$381,150.00) as the civil penalty for the violations alleged in this Complaint. The proposed penalties were calculated in accordance with the "October 1990 RCRA Civil Penalty Policy." Under the penalty policy, EPA uses a penalty assessment matrix, which is then adjusted to take into account multi-day violations, case-specific circumstances, and the economic benefit gained from non-compliance, where appropriate.

#### Count I

Failure to Submit A Closure Plan .....\$151,750.00

Using the penalty assessment matrix, EPA classified Count I as presenting a major potential for harm and a moderate deviation from the requirement. The potential for harm is major because Respondent did not seek or receive approval for a closure plan from regulatory agencies and thus did not afford these agencies the opportunity to fulfill their obligations to review and approve the closure plan to ensure protection of human health and the environment. Although totally failing to meet the regulatory requirements, the extent of deviation from the regulations is only moderate because a state agency may have had some knowledge of Respondent's activities. The proposed penalty amount was adjusted for multi-day violations (179 days) because the Respondent never submitted the closure plan. The penalty was not adjusted for case-specific circumstances.

#### Count II

Unauthorized Modifications and Additions.....\$51,250.00

Using the penalty assessment matrix, EPA classified Count II as presenting a moderate potential for harm and a moderate deviation from the requirement. The potential for harm is only moderate because Respondent's unapproved modifications and additions had a significant effect on the regulatory permitting scheme, but the new units probably did not cause or increase any harm to human health or the environment. The extent of deviation from the regulation is only moderate because although the changes made at the facility were explicitly prohibited a state agency may have had some knowledge of Respondent's activities. The penalty was adjusted for multi-day violation (179 days) because the Respondent failed to notify and receive the approval of regulatory agencies for these changes during the eight years after the modifications and additions occurred. The penalty was not adjusted for case-specific circumstances.

Count III

Failure to Close In An Appropriate Manner.....\$178,150.00

Using the penalty assessment matrix, EPA classified Count III as presenting a major potential for harm and a moderate deviation from the requirement. The potential for harm is major because the Respondent was aware at the time of removing the tanks that contamination was present in the soil and groundwater and neglected to take the required steps to remove the contamination or properly monitor and control the contamination. This failure poses a substantial harm to the environment, to human health, and to the purpose of RCRA. The extent of deviation from the regulations is only moderate because although Respondent failed totally to perform the requirements of the regulations a state agency may have had some knowledge of Respondent's activities. The penalty was adjusted for multi-day violations (179 days) because Respondent failed to properly close (and therefore contamination has been left in place and/or unmonitored) for more than eight years. The penalty was adjusted upward by \$26,400.00 for the economic benefit that Respondent gained for non-compliance. The penalty was not adjusted for other case-specific circumstances.

TOTAL PROPOSED PENALTY.....\$381,150.00

COMPLIANCE ORDER

A. PAYMENT OF CIVIL PENALTY

1. It is hereby ordered that Respondent shall submit a sum of THREE HUNDRED EIGHTY-ONE THOUSAND AND ONE HUNDRED FIFTY DOLLARS (\$381,150.00). Enclosed is EPA Form 2570-6, Funds Transfer Deposit, to be used for your payment. Please take this form to your bank and request it to wire the amount stated on it through the Federal Reserve Communication System (FRCS) to the account of the U.S. Treasury at the Federal Reserve Bank of New York. Payment shall be remitted within (30) days of the Effective Date of this Complaint.

2. In accordance with the Debt Collection Act of 1982 and U.S. Treasury (TFRM 6-8000), payment must be received within thirty (30) days of the effective date of this Complaint to avoid additional charges. If payment is not received within thirty (30) days, interest will accrue from the Effective Date of this Complaint at the current interest rate published by the U.S. Treasury. A late penalty charge of \$20.00 will be imposed after thirty (30) days with an additional charge of \$10.00 for each

subsequent thirty (30) day period. A 6% per annum penalty will further apply on any principal amount not paid within ninety (90) days of the due date.

B. COMPLIANCE

3. Respondent is ordered to come into compliance with the requirements of Sections 3004 and 3005 of RCRA, 42 U.S.C. §§ 6924 and 6925, and 40 C.F.R. Part 265, to undertake the following activities, and to make submittals and certification to Complainant within the times specified below. All days are consecutive calendar days from the Effective Date of this Complaint. In accordance with the findings presented in this Complaint, Respondent is hereby ordered to:

<u>Compliance Required</u>	<u>Date of Compliance</u>
----------------------------	---------------------------

Counts I and III

- |   |         |
|---|---------|
| a) Submit closure plan which addresses closure of Tanks #1 and #2 and Storage Yards #1 and #2.  | 60 days |
| b) Submit post-closure plan, and post-closure permit application (Part B) for the Tank #1 area. | 60 days |

Count II

- |   |          |
|---|----------|
| c) Submit a complete description with photographic documentation of the physical structures and uses of Current Solvent Tank and Current Storage Container Yard.                    | 30 days  |
| d) Submit an amended Part A with reconstruction information and the basis for approval under 40 C.F.R. §270.72 for Current Solvent Storage Tank and Current Container Storage Yard. | 30 days  |
| e) Certify compliance with all requirements of 40 C.F.R. Part 265, specifically including Subpart J, for Current Solvent Tank and Current Container Storage Yard.                   | 30 days, |

4. Respondent shall provide documentation of compliance with the above Compliance Order with submittals and certification within the time periods specified above to:

Greg Czajkowski (H-4-3)  
Hazardous Waste Management Division  
U.S. EPA Region IX  
75 Hawthorne St.  
San Francisco, CA 94105

C. FAILURE TO COMPLY

5. In the event Respondent fails to comply with any provision of the Compliance Order, then in accordance with Section 3008(c) of RCRA, 42 U.S.C. §6928(c), Respondent shall be liable for a civil penalty of not more than TWENTY-FIVE THOUSAND DOLLARS (\$25,000.00) for each day of continued noncompliance.

NOTICE OF RIGHT TO REQUEST A HEARING

A. PUBLIC HEARING

1. In accordance with Section 3008(b) of RCRA, 42 U.S.C. §6928(b), the Compliance Order set forth herein shall become final unless Respondent files an Answer and request for public hearing in writing no later than thirty (30) days after the Effective Date of the Complaint with the Regional Hearing Clerk, United States Environmental Protection Agency, Region IX, 75 Hawthorne St., San Francisco, California 94105. A copy of the Answer and request for hearing and copies of all other documents relating to these proceedings filed with the Regional Hearing Clerk should be sent to Gregory B. Lind (RC-3-2), Assistant Regional Counsel at the above address.

2. The Answer must clearly and directly admit, deny or explain each of the factual allegations contained in the Complaint with regard to which you have any knowledge. A failure to admit, deny or explain any material fact or allegation will constitute an admission of the allegation. The Answer must also state (1) the circumstances or arguments which constitute the ground of defense and (2) the facts which you intend to place at issue.

3. If you fail to file a written Answer within thirty (30) days of the Effective Date of Complaint, you may be found in default. Respondent's default will constitute an admission of all facts alleged in the Complaint and a waiver of your right to a hearing. A default order may thereafter be issued by the Regional Administrator of EPA and the penalty proposed in the complaint will become due and payable without further proceedings.

4. If you request a public hearing, it will be held in a location determined in accordance with the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, 40 C.F.R. Part 22, a copy of which accompanies the Complaint. The hearing will be conducted in accordance with the provisions of the Administrative Procedure Act, 5 U.S.C. §552 et seq., and 40 C.F.R. Part 22.

B. INFORMAL SETTLEMENT

5. Whether or not you request a hearing, you may confer informally with EPA to discuss the alleged facts, violations and amount of the penalty. An informal conference does not, however, affect your obligation to file a written Answer within thirty (30) days of the Effective Date of the Complaint. The informal conference procedure may be pursued simultaneously with the adjudicatory hearing procedure.

6. Any settlement reached as a result of an informal conference will, in addition to the compliance schedule set forth in the Order above, be embodied in a written Consent Agreement and Final Order. The issuance of the Consent Agreement and Final Order will constitute waiver of your right to a hearing on any matter to which you have stipulated.

7. If a settlement cannot be reached through an informal conference, the filing of a written Answer within 30 days of the Effective Date of the complaint will preserve your right to a hearing.

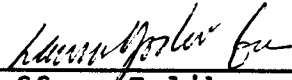
8. EPA encourages all parties against whom a penalty is proposed to explore the possibility of settlement. To request an informal conference, you should contact Gregory B. Lind, Assistant Regional Counsel, Office of Regional Counsel, at the above address, telephone number (415) 744-1320.

EFFECTIVE DATE

The Effective Date of this Complaint is the date of Service. Service is complete when the return mail receipt is signed by the Respondent or a duly authorized representative of the Respondent, in accordance with the provisions of 40 C.F.R. §§ 22.05(b) and 22.07(c).

Date

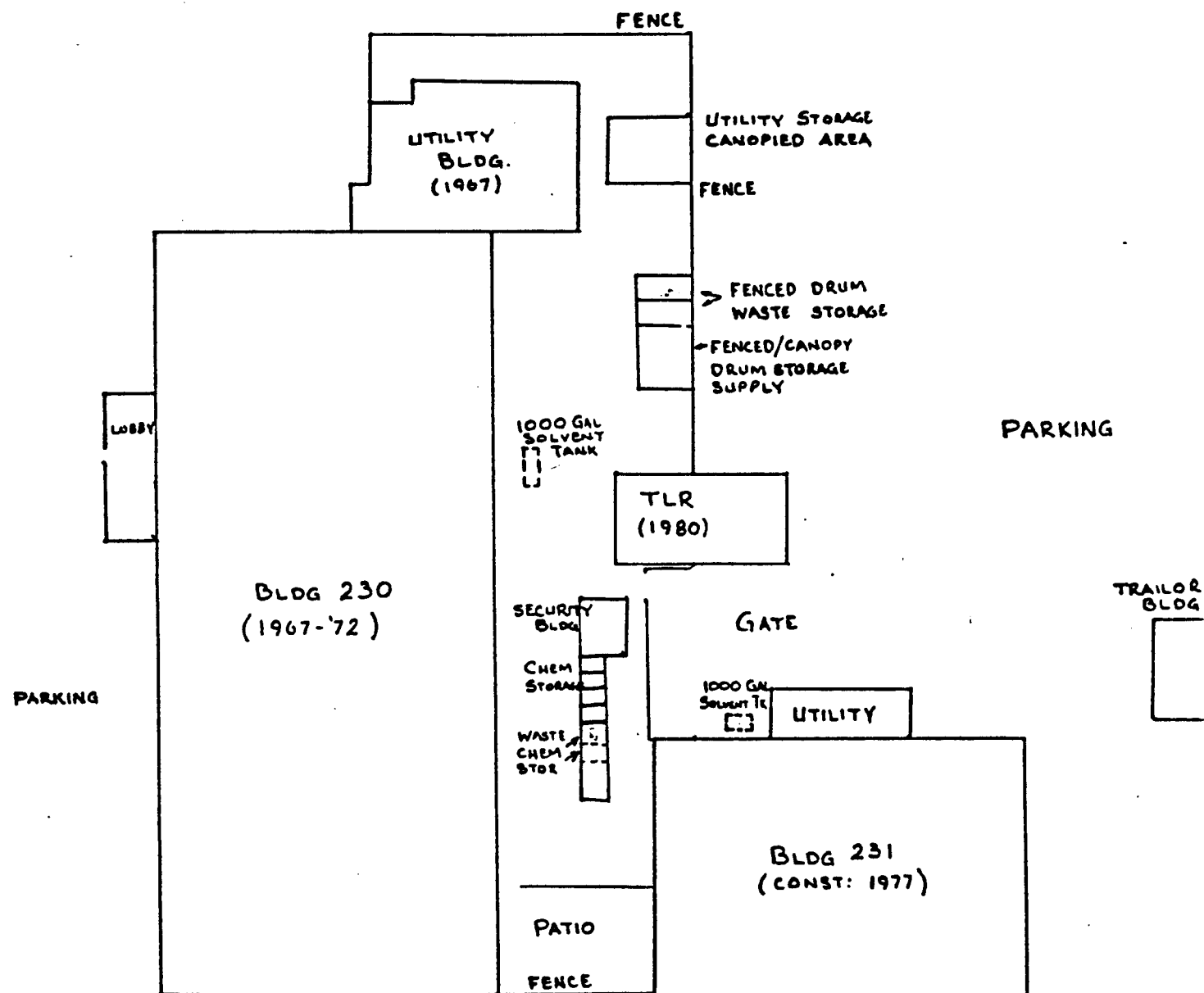
1/31/92

  
Jeffrey Zelikson  
Director

Hazardous Waste Management Division

V. FACILITY DRAWING (see page 4)

Attachment # 1

HAZARDOUS WASTE  
MANAGEMENT FACILITIES

PROPERTY LINE

← LOMITA BLVD

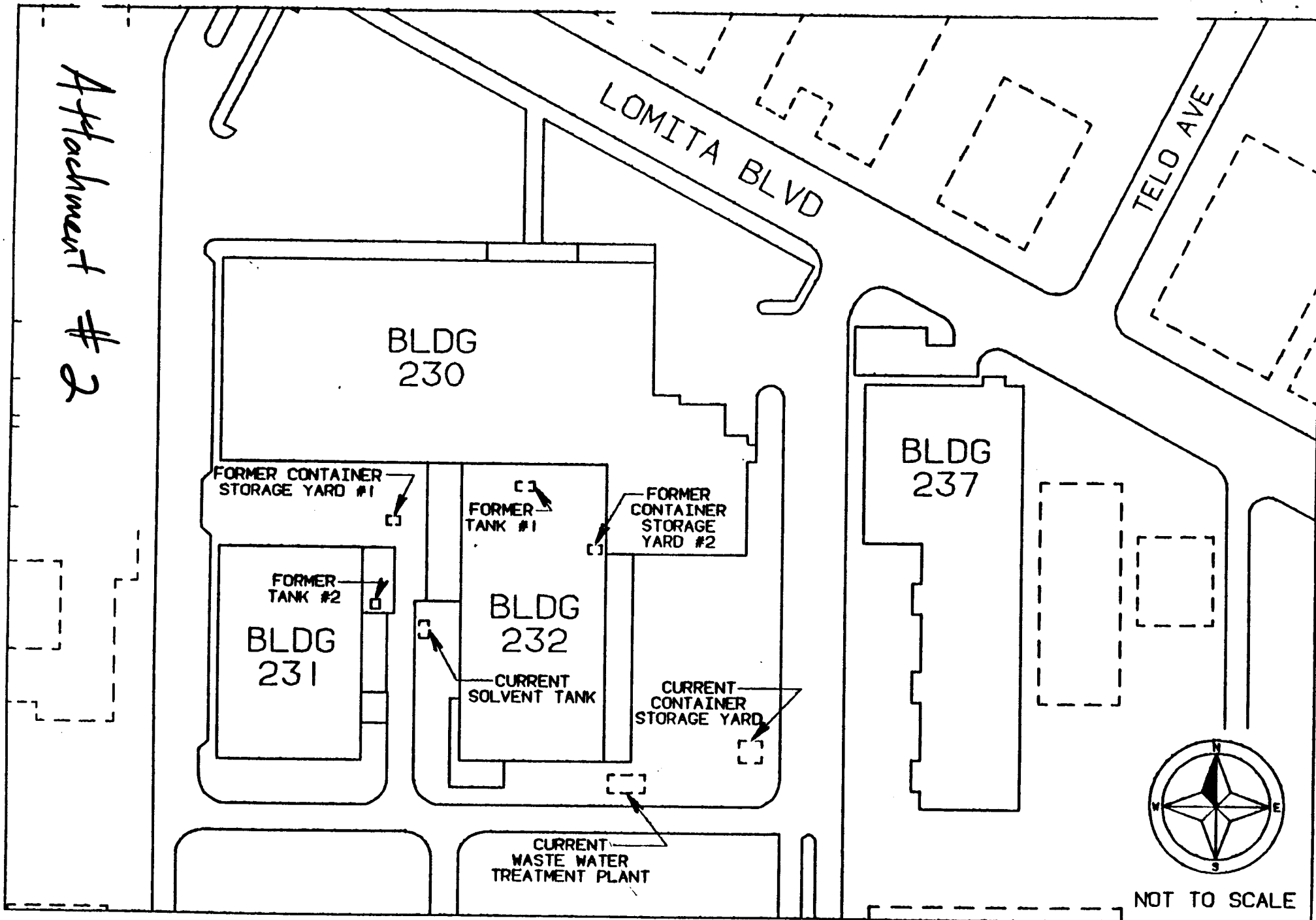
HUGHES AIRCRAFT CO.  
3100 W. LOMITA  
TORRANCE, CALIF.  
90509

33° 48' 37" N  
118° 20' 25" W  
NO: INTAKE/DISCHARGE STRUCTURES  
FLUID INJECTION SITES  
SPRINGS, SURFACE WATER, DRINKING W/  
WELL:  
SCALE 1 in = 100 FT

COPY FROM DESIGN BY M. FLINN



Attachment # 2



FACILITY MAP - HUGHES AIRCRAFT COMPANY  
Torrance, California

**CERTIFICATION OF SERVICE**

I hereby certify that the original of the foregoing Determination of Violation, Compliance Order, and Notice of Right to Request a Hearing was filed with the Regional Hearing Clerk, Region 9, and that a copy was sent, along with a copy of 40 C.F.R. Part 22 Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, certified mail, return receipt requested, to:

Mr. Malcom Currie  
Chief Executive Officer  
Hughes Aircraft Company  
7200 Hughes Terrace  
Los Angeles, CA 90045

7/31/92

Date



Hazardous Waste Management Division

RECORDS SEPARATOR PAGE

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FILED

JUL 31 1992

UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION IX

JUL 31 1992

Regional Hearing  
Clerk  
J.C.

In the matter of	)	Docket No. RCRA-09-92-0012
	)	
Hughes Aircraft Company	)	
EPA ID No. CAD041666819	)	DETERMINATION OF VIOLATION
	)	COMPLIANCE ORDER
	)	AND
Respondent.	)	NOTICE OF RIGHT TO
	)	REQUEST A HEARING

DETERMINATION OF VIOLATION

A. INTRODUCTION

1. This is a civil administrative enforcement action instituted pursuant to Section 3008(a)(1) of the Resource Conservation and Recovery Act ("RCRA"), as amended, 42 U.S.C. §6928(a)(1), and the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, 40 C.F.R. Part 22. Complainant is the United States Environmental Protection Agency, Region IX ("EPA"). Respondent is Hughes Aircraft Company, a Delaware corporation ("Respondent").

2. Respondent operates a facility that engages in the manufacturing and processing of electronic components, and that is located at 3100 West Lomita Boulevard in Torrance, California, EPA Identification Number CAD041666819 (the "Facility").

3. This Determination of Violation, Compliance Order and Notice of Right to Request a Hearing ("Complaint") serves as notice that EPA, on the basis of information available to it, has determined that Respondent is in violation of Section 3004 and 3005 of RCRA, 42 U.S.C. §§ 6924 and 6925, and regulations adopted pursuant thereto.

B. JURISDICTION

4. Respondent is a "person" as defined in Section 1004(15) of RCRA, 42 U.S.C. §6903(15), and 40 C.F.R. §§ 260.10 and 270.2.

5. Respondent is a "generator" of hazardous waste as defined in 40 C.F.R. §260.10.

6. Respondent generates, treats, and stores, or has generated, treated, and stored, "hazardous waste" as defined in Section 1004(5) of RCRA, 42 U.S.C. §6903(5), and 40 C.F.R. §§ 260.10 and 261.3.
7. The Facility is an "existing hazardous waste management facility" as defined in 40 C.F.R. §§ 260.10 and 270.2.
8. Respondent is the "operator" of a facility as defined in 40 C.F.R. §§ 260.10 and 270.2.
9. On or about August 12, 1980, pursuant to Section 3010 of RCRA, 42 U.S.C. §6930, Respondent submitted to EPA a Notification of Hazardous Waste Activity.
10. On or about November 1, 1980, pursuant to Section 3005 of RCRA, 42 U.S.C. §6925, and 40 C.F.R. §270.10(a), Respondent submitted to EPA the Part A of the Facility's RCRA Permit Application for storage and treatment of hazardous waste (the "Part A").
11. The Facility obtained interim status for the hazardous waste management units described in its Part A pending final administrative disposition of its permit application pursuant to Section 3005(e) of RCRA, 42 U.S.C. §6925(e).
12. On June 4, 1981, EPA awarded to the State of California Phase I Interim Authorization to administer the RCRA hazardous waste program as provided by Section 3006(b) (1) of RCRA, 42 U.S.C. §6926(b) (1) and 40 C.F.R. Part 271, Subpart B (formerly Part 123, Subpart F).
13. On January 11, 1983, EPA awarded to the State of California Phase II-A Interim Authorization to administer the RCRA hazardous waste program as provided by Section 3006(b)(1) of RCRA, 42 U.S.C. §6926(b)(1) and 40 C.F.R. Part 271, Subpart B (formerly Part 123, Subpart F).
14. Interim authorization required, inter alia, that the State of California impose interim status standards upon hazardous waste management facilities, as required by Section 3005(e) of RCRA, 42 U.S.C. §6925(e).
15. On January 15, 1982 (effective December 16, 1981), the State of California Department of Health Services issued to the Respondent an Interim Status Document (the "ISD") which contained conditions of operation for the Facility, pursuant to Section 25200.5 of the California Health and Safety Code (H.S.C.).
16. Pursuant to General Condition 1.1 of the ISD and Sections 25159.5(b) and 25159.6 of the H.S.C., Respondent was required to meet the requirements of the federal regulations (inter alia, 40

C.F.R. Parts 265 and 270) adopted pursuant to Sections 3004 and 3005 of RCRA, 42 U.S.C. §§ 6924 and 6925. ~~CA phase I/phase II~~

17. On January 31, 1986, the State of California's interim authorization to administer the RCRA hazardous waste program expired (51 Fed. Reg. 4128 (January 31, 1986)).

18. Respondent is, therefore, subject to the federal regulations (inter alia, 40 C.F.R. Parts 265 and 270) adopted pursuant to Sections 3002, 3004 and 3005 of RCRA, 42 U.S.C. §§ 6922, 6924 and 6925.

19. Section 3008 of RCRA, 42 U.S.C. §6928, authorizes the Administrator, U.S. Environmental Protection Agency, to issue orders requiring compliance immediately or within a specified time for violation of any requirement of Subtitle C of RCRA, Section 3001 of RCRA et seq., 42 U.S.C. §6921 et seq.

20. EPA evaluated various documents supplied by Respondent, and on the basis of this evaluation has determined that Respondent has violated California's previously authorized hazardous waste program and Subtitle C of RCRA, specifically Sections 3004 and 3005 of RCRA, 42 U.S.C. §§6924 and 6925, and regulations adopted pursuant thereto, 40 C.F.R. Parts 265 and 270.

21. Respondent, in violating 40 C.F.R. Parts 265 and 270, has violated Subtitle C of RCRA and, therefore, is subject to the powers vested in the EPA Administrator by Section 3008 of RCRA, 42 U.S.C. §6928.

22. The Administrator has delegated the authority under Section 3008 of RCRA to the EPA Regional Administrator for Region IX, who has redelegated this authority to the Director of the Hazardous Waste Management Division.

#### C. STATEMENT OF FACTS

23. On or about November 5, 1980, Respondent submitted to EPA the Part A of the RCRA permit application ("Part A") which identified the following hazardous waste management units: a) a storage tank referred to as Tank #1; b) a storage tank referred to as Tank #2; c) a storage yard (referred to herein at "Storage Yard #1") identified as "Waste Chem Storage"; and d) a storage yard (referred to herein as "Storage Yard #2") identified as Fenced Drum Waste Storage. A map (included in this Complaint as Attachment No. #1) included in the Part A located the units as follows: Tank #1--southeast of building #230; Tank #2--east of building #231; Storage Yard #1--between buildings #230 and #231; and Storage Yard #2--south of building #230 and east of building #231.

24. On March 25, 1991, pursuant to Section 3007(a), 42 U.S.C. §6927(a), EPA requested information from Respondent about the operating status and locations of Tank #1, Tank #2, Storage Yard #1, Storage Yard #2, and the location and operating status of any other hazardous waste management units at the Facility. On May 2, 1991 the Respondent identified Tank #1 as Former Tank #1, Tank #2 as Former Tank #2, Storage Yard #1 as Former Storage Yard #1, and Storage Yard #2 as Former Storage Yard #2. A map (included in this Complainant as Attachment No. #2) submitted by the Respondent and drawn after 1983 identifies the former site of Tank #1 ("Former Tank #1"), under a new building (building #232) and identifies the former site of Tank #2 ("Former Tank #2") enclosed within building #231. The location of a new tank (the "Current Solvent Tank") is adjacent to building #232. Storage Yards #1 and #2 have been removed and replaced with a new storage area (the "Current Container Storage Yard") located east of building #232.

D. VIOLATIONS

Count I

[Failure to Submit A Closure Plan]

25. Paragraphs 1 through 24 above are incorporated herein by this reference as if they were set forth here in their entirety.

26. 40 C.F.R. §265.112(c) requires the owner and operator of a hazardous waste management facility to submit a closure plan to the Regional Administrator at least 180 days prior to the date closure begins.

27. Section V.2.c. of the ISD required the Respondent to submit a Closure Plan to the California Regional Water Quality Control Board (CRWQCB) at least 180 days before the date closure is expected to begin.

28. On or about July 1, 1983 and June 24, 1983 Respondent closed four hazardous waste storage units--Tanks #1 and #2 and Storage Yards #1 and #2.

29. Respondent did not submit a closure plan to the CRWQCB 180 days prior to closure of the units described in Paragraph 28. To date, Respondent has not submitted a closure plan to the CRWQCB or the Regional Administrator for the closure of the units.

30. Therefore, by failing to submit a closure plan, Respondent has violated ISD Section V.2.c. and 40 C.F.R. §265.112(c).

### Count II

#### [Unauthorized Modifications and Additions to the Facility]

31. Paragraphs 1 through 24 above are incorporated herein by this reference as if they were set forth here in their entirety.
32. 40 C.F.R. §270.71 prohibits the owner and operator from employing processes not specified in the Part A of the RCRA permit application while the facility operates under interim status.
33. 40 C.F.R. §270.72 prohibits the owner and operator from making changes in the hazardous waste management operations at its facility except for specifically listed changes. 40 C.F.R. §270.72(a)(3) prohibits the owner and operator from changing the hazardous waste processes employed at its facility unless the owner and operator obtain the Director's approval for the change.
34. Section I.4.c. of the ISD prohibits Respondent from making substantial modifications and additions to the Facility.
35. On or about June 24, 1983 and July 1, 1983 the Respondent took the following actions: removed Tanks #1 and #2, installed a new tank in a new location (Current Solvent Tank), removed Storage Yards #1 and #2, and constructed a new storage yard (Current Container Storage Yard) at a different location.
36. Respondent did not seek nor receive approval for the changes outlined in Paragraph 35.
37. The Current Solvent Tank and Current Container Storage Yard were not in existence on November 19, 1980 and were not specified in Respondent's Part A of the RCRA permit applicaiton.
38. Therefore, by removing Tanks #1 and #2 and Storage Yards #1 and #2 and installing the Current Solvent Tank and the Current Container Storage Yard, Respondent made substantial modifications and additions to the Facility, changed the processes employed at the Facility, and made unauthorized changes to the hazardous waste management activites at the Facility, Respondent has violated ISD Section I.4.c. and 40 C.F.R. §§ 270.71 and 270.72.

### Count III

#### [Failure to Close In An Appropriate Manner]

39. Paragraphs 1 through 24 above are incorporated herein by this reference as if they were set forth here in their entirety.
40. 40 C.F.R. §265.111 requires the owner and operator to close the facility in a manner to control, minimize or eliminate the post-closure escape of hazardous waste or hazardous constituents to the extent necessary to protect human health and the environment.



41. Section V.1.b. of the ISD required Respondent to close the Facility in a manner to control, minimize or eliminate the post-closure escape of hazardous waste or hazardous constituents to the extent necessary to protect human health and the environment.

42. On or about July 1, 1983 and June 24, 1983 Respondent closed four hazardous waste storage units--Tanks #1 and #2 and Storage Yards #1 and #2.

43. On or about June 15, 1983 and August 29, 1983, following the closure of Tanks #1 and #2, Respondent received information that identified the following levels of hazardous constituents in subsurface soil where Tank #1 had previously been located: 440,000 ug/kg tetrachloroethylene, 19,000 ug/kg trichloroethylene, 18,000 ug/kg 1,1,1-trichloroethane, 520 ug/kg acetone 610 ug/kg ethyl benzene, and 1,200 ug/kg toluene. The following levels of volatile organic compounds were identified in shallow groundwater beneath the site of Tank #1: 65 ug/L trichloroethylene, 12 ug/L trichlorofluoromethane, 11 ug/L tetrachloroethylene, and 5 ug/L trichloroethane.

44. On or about November 5, 1980, Respondent submitted to EPA the Part A of the RCRA permit application and indicated under Part D (Processes) of this permit application that F003, F005, and F017 hazardous wastes were being stored in tanks. F003 hazardous wastes include acetone and ethyl benzene; F005 hazardous wastes include toluene.

45. On or about October 25, 1991, Respondent received additional information that revealed the likelihood that contamination that originated from Tank #1 was migrating away from the original site of Tank #1.

46. Therefore, by failing to close the Facility in a manner that protects human health and the environment, Respondent has violated 40 C.F.R. §265.111.

#### D. CIVIL PENALTY

47. Section 3008(g) of RCRA, 42 U.S.C. §6928(g), authorizes a civil penalty of up to TWENTY-FIVE THOUSAND DOLLARS (\$25,000.00) per day for each violation of Subtitle C of RCRA, 42 U.S.C. §6921 et seq. Based upon the facts alleged in this Complaint and upon those factors which the Complainant must consider pursuant to Section 3008(a)(3) of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. §6928(a)(3), and the RCRA Civil Penalty Policy, including the seriousness of the violations, any good faith efforts by the Respondent to comply with applicable requirements, and any economic benefit accruing to Respondent, as well as such other matters as justice may require, Complainant proposes that the Respondent be assessed THREE HUNDRED EIGHTY-ONE THOUSAND AND ONE

HUNDRED FIFTY DOLLARS (\$381,150.00) as the civil penalty for the violations alleged in this Complaint. The proposed penalties were calculated in accordance with the "October 1990 RCRA Civil Penalty Policy." Under the penalty policy, EPA uses a penalty assessment matrix, which is then adjusted to take into account multi-day violations, case-specific circumstances, and the economic benefit gained from non-compliance, where appropriate.

#### Count I

Failure to Submit A Closure Plan .....\$151,750.00

Using the penalty assessment matrix, EPA classified Count I as presenting a major potential for harm and a moderate deviation from the requirement. The potential for harm is major because Respondent did not seek or receive approval for a closure plan from regulatory agencies and thus did not afford these agencies the opportunity to fulfill their obligations to review and approve the closure plan to ensure protection of human health and the environment. Although totally failing to meet the regulatory requirements, the extent of deviation from the regulations is only moderate because a state agency may have had some knowledge of Respondent's activities. The proposed penalty amount was adjusted for multi-day violations (179 days) because the Respondent never submitted the closure plan. The penalty was not adjusted for case-specific circumstances.

#### Count II

Unauthorized Modifications and Additions.....\$51,250.00

Using the penalty assessment matrix, EPA classified Count II as presenting a moderate potential for harm and a moderate deviation from the requirement. The potential for harm is only moderate because Respondent's unapproved modifications and additions had a significant effect on the regulatory permitting scheme, but the new units probably did not cause or increase any harm to human health or the environment. The extent of deviation from the regulation is only moderate because although the changes made at the facility were explicitly prohibited a state agency may have had some knowledge of Respondent's activities. The penalty was adjusted for multi-day violation (179 days) because the Respondent failed to notify and receive the approval of regulatory agencies for these changes during the eight years after the modifications and additions occurred. The penalty was not adjusted for case-specific circumstances.

Count III

Failure to Close In An Appropriate Manner.....\$178,150.00

Using the penalty assessment matrix, EPA classified Count III as presenting a major potential for harm and a moderate deviation from the requirement. The potential for harm is major because the Respondent was aware at the time of removing the tanks that contamination was present in the soil and groundwater and neglected to take the required steps to remove the contamination or properly monitor and control the contamination. This failure poses a substantial harm to the environment, to human health, and to the purpose of RCRA. The extent of deviation from the regulations is only moderate because although Respondent failed totally to perform the requirements of the regulations a state agency may have had some knowledge of Respondent's activities. The penalty was adjusted for multi-day violations (179 days) because Respondent failed to properly close (and therefore contamination has been left in place and/or unmonitored) for more than eight years. The penalty was adjusted upward by \$26,400.00 for the economic benefit that Respondent gained for non-compliance. The penalty was not adjusted for other case-specific circumstances.

TOTAL PROPOSED PENALTY.....\$381,150.00

COMPLIANCE ORDER

A. PAYMENT OF CIVIL PENALTY

1. It is hereby ordered that Respondent shall submit a sum of THREE HUNDRED EIGHTY-ONE THOUSAND AND ONE HUNDRED FIFTY DOLLARS (\$381,150.00). Enclosed is EPA Form 2570-6, Funds Transfer Deposit, to be used for your payment. Please take this form to your bank and request it to wire the amount stated on it through the Federal Reserve Communication System (FRCS) to the account of the U.S. Treasury at the Federal Reserve Bank of New York. Payment shall be remitted within (30) days of the Effective Date of this Complaint.

2. In accordance with the Debt Collection Act of 1982 and U.S. Treasury (TFRM 6-8000), payment must be received within thirty (30) days of the effective date of this Complaint to avoid additional charges. If payment is not received within thirty (30) days, interest will accrue from the Effective Date of this Complaint at the current interest rate published by the U.S. Treasury. A late penalty charge of \$20.00 will be imposed after thirty (30) days with an additional charge of \$10.00 for each

subsequent thirty (30) day period. A 6% per annum penalty will further apply on any principal amount not paid within ninety (90) days of the due date.

B. COMPLIANCE

3. Respondent is ordered to come into compliance with the requirements of Sections 3004 and 3005 of RCRA, 42 U.S.C. §§ 6924 and 6925, and 40 C.F.R. Part 265, to undertake the following activities, and to make submittals and certification to Complainant within the times specified below. All days are consecutive calendar days from the Effective Date of this Complaint. In accordance with the findings presented in this Complaint, Respondent is hereby ordered to:

<u>Compliance Required</u>	<u>Date of Compliance</u>
----------------------------	---------------------------

Counts I and III

- |   |         |
|---|---------|
| a) Submit closure plan which addresses closure of Tanks #1 and #2 and Storage Yards #1 and #2.  | 60 days |
| b) Submit post-closure plan, and post-closure permit application (Part B) for the Tank #1 area. | 60 days |

Count II

- |   |          |
|---|----------|
| c) Submit a complete description with photographic documentation of the physical structures and uses of Current Solvent Tank and Current Storage Container Yard.                    | 30 days  |
| d) Submit an amended Part A with reconstruction information and the basis for approval under 40 C.F.R. §270.72 for Current Solvent Storage Tank and Current Container Storage Yard. | 30 days  |
| e) Certify compliance with all requirements of 40 C.F.R. Part 265, specifically including Subpart J, for Current Solvent Tank and Current Container Storage Yard.                   | 30 days, |

4. Respondent shall provide documentation of compliance with the above Compliance Order with submittals and certification within the time periods specified above to:

Greg Czajkowski (H-4-3)  
Hazardous Waste Management Division  
U.S. EPA Region IX  
75 Hawthorne St.  
San Francisco, CA 94105

C. FAILURE TO COMPLY

5. In the event Respondent fails to comply with any provision of the Compliance Order, then in accordance with Section 3008(c) of RCRA, 42 U.S.C. §6928(c), Respondent shall be liable for a civil penalty of not more than TWENTY-FIVE THOUSAND DOLLARS (\$25,000.00) for each day of continued noncompliance.

NOTICE OF RIGHT TO REQUEST A HEARING

A. PUBLIC HEARING

1. In accordance with Section 3008(b) of RCRA, 42 U.S.C. §6928(b), the Compliance Order set forth herein shall become final unless Respondent files an Answer and request for public hearing in writing no later than thirty (30) days after the Effective Date of the Complaint with the Regional Hearing Clerk, United States Environmental Protection Agency, Region IX, 75 Hawthorne St., San Francisco, California 94105. A copy of the Answer and request for hearing and copies of all other documents relating to these proceedings filed with the Regional Hearing Clerk should be sent to Gregory B. Lind (RC-3-2), Assistant Regional Counsel at the above address.

2. The Answer must clearly and directly admit, deny or explain each of the factual allegations contained in the Complaint with regard to which you have any knowledge. A failure to admit, deny or explain any material fact or allegation will constitute an admission of the allegation. The Answer must also state (1) the circumstances or arguments which constitute the ground of defense and (2) the facts which you intend to place at issue.

3. If you fail to file a written Answer within thirty (30) days of the Effective Date of Complaint, you may be found in default. Respondent's default will constitute an admission of all facts alleged in the Complaint and a waiver of your right to a hearing. A default order may thereafter be issued by the Regional Administrator of EPA and the penalty proposed in the complaint will become due and payable without further proceedings.

4. If you request a public hearing, it will be held in a location determined in accordance with the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, 40 C.F.R. Part 22, a copy of which accompanies the Complaint. The hearing will be conducted in accordance with the provisions of the Administrative Procedure Act, 5 U.S.C. §552 et seq., and 40 C.F.R. Part 22.

B. INFORMAL SETTLEMENT

5. Whether or not you request a hearing, you may confer informally with EPA to discuss the alleged facts, violations and amount of the penalty. An informal conference does not, however, affect your obligation to file a written Answer within thirty (30) days of the Effective Date of the Complaint. The informal conference procedure may be pursued simultaneously with the adjudicatory hearing procedure.

6. Any settlement reached as a result of an informal conference will, in addition to the compliance schedule set forth in the Order above, be embodied in a written Consent Agreement and Final Order. The issuance of the Consent Agreement and Final Order will constitute waiver of your right to a hearing on any matter to which you have stipulated.

7. If a settlement cannot be reached through an informal conference, the filing of a written Answer within 30 days of the Effective Date of the complaint will preserve your right to a hearing.

8. EPA encourages all parties against whom a penalty is proposed to explore the possibility of settlement. To request an informal conference, you should contact Gregory B. Lind, Assistant Regional Counsel, Office of Regional Counsel, at the above address, telephone number (415) 744-1320.

EFFECTIVE DATE

The Effective Date of this Complaint is the date of Service. Service is complete when the return mail receipt is signed by the Respondent or a duly authorized representative of the Respondent, in accordance with the provisions of 40 C.F.R. §§ 22.05(b) and 22.07(c).

Date

7/31/92

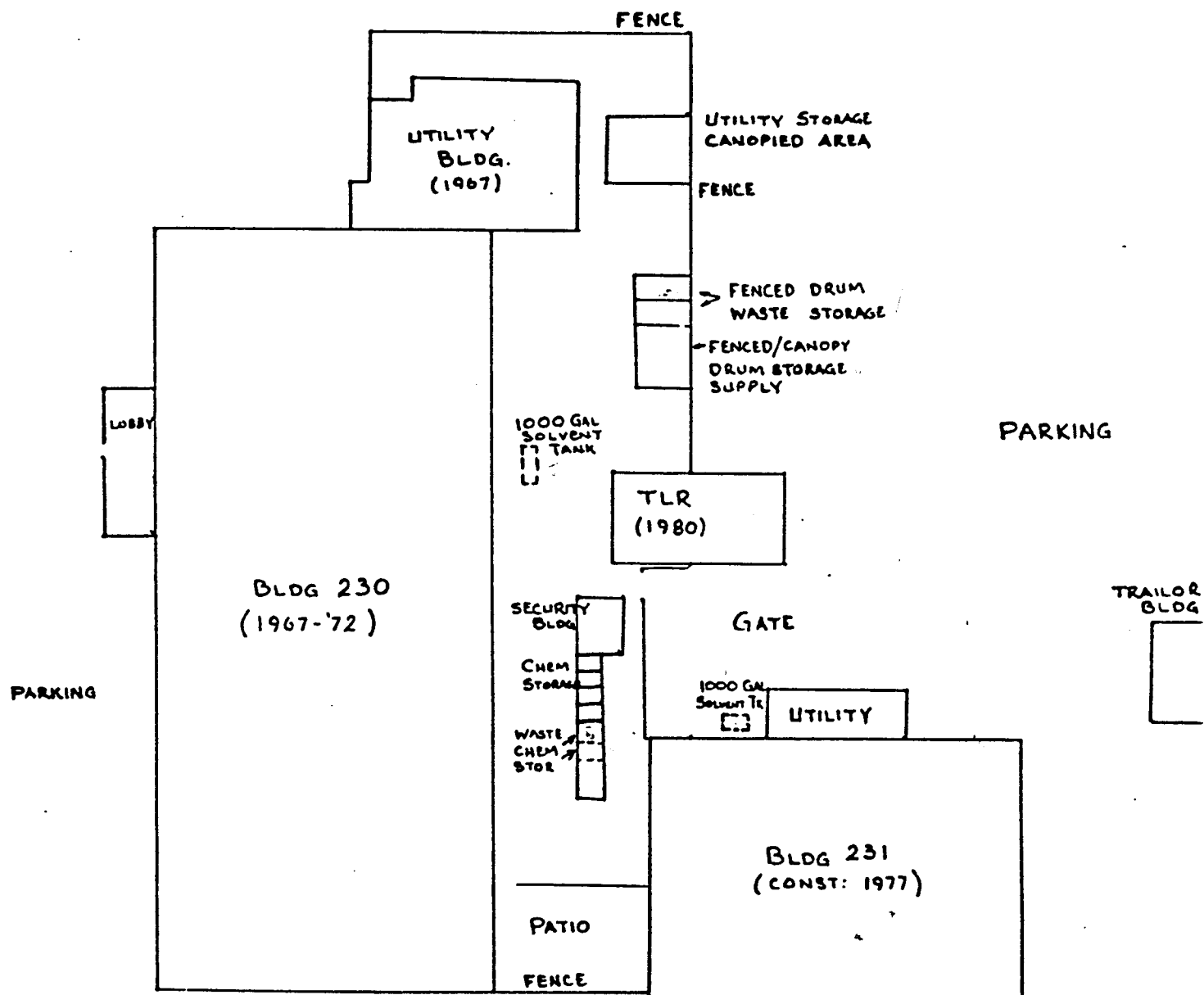
Jeffrey Zelikson

Director

Hazardous Waste Management Division

V. FACILITY DRAWING (see page 4)

Attachment # 1

HAZARDOUS WASTE  
MANAGEMENT FACILITIES

PROPERTY LINE

← LOMITA BLVD

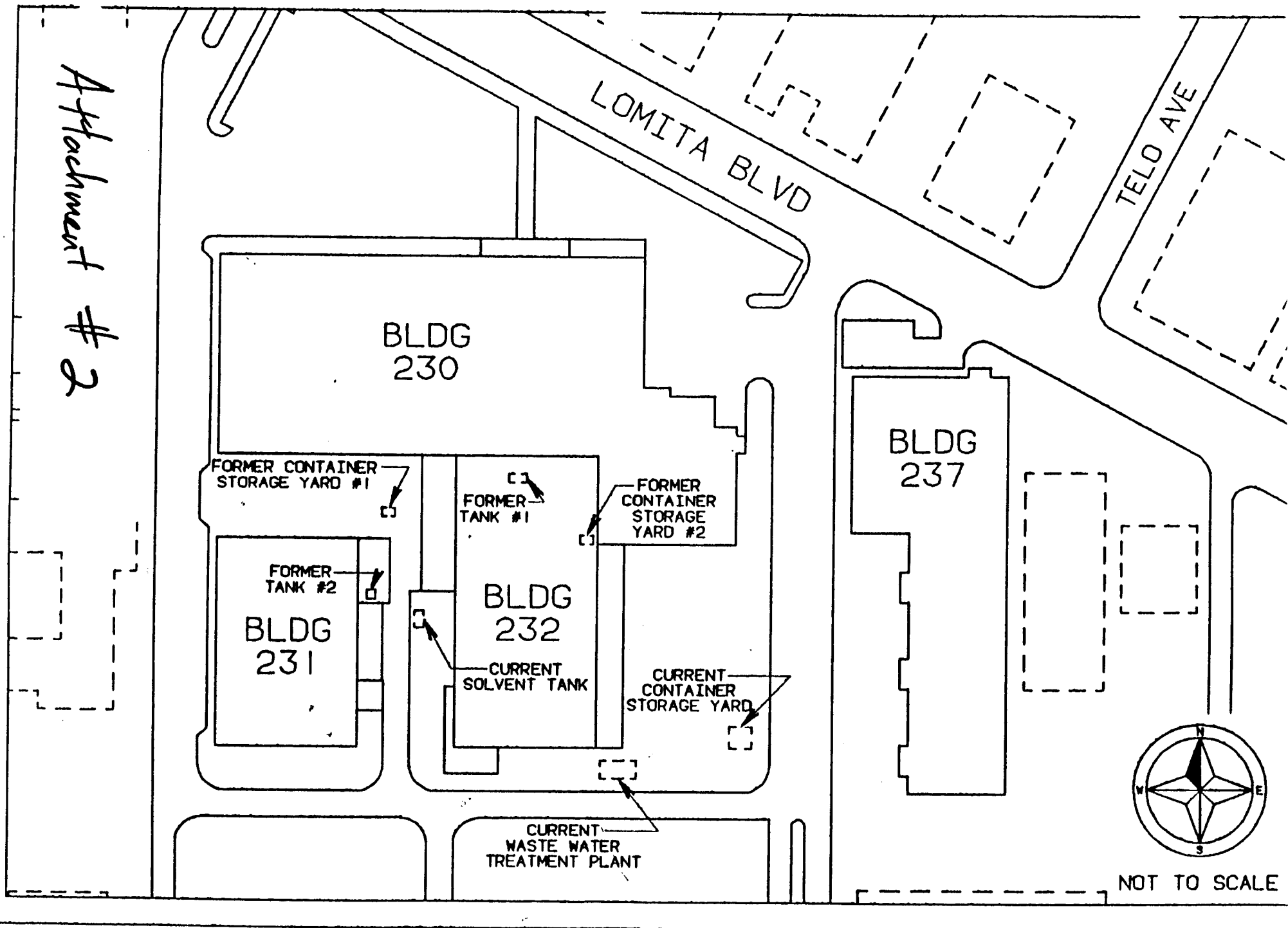
HUGHES AIRCRAFT CO.  
3100 W. LOMITA  
TORRANCE, CALIF.  
90509

33° 48' 37" N  
118° 20' 25" W  
NO: INTAKE/DISCHARGE STRUCTURES  
FLUID INJECTION SITES  
SPRINGS, SURFACE WATER, DRINKING W/ WELL:  
SCALE 1 in = 100 FT

COPY FROM DESIGN BY M. FLINN

CADD04166681

Attachment # 2



FACILITY MAP - HUGHES AIRCRAFT COMPANY  
Torrance, California



CERTIFICATION OF SERVICE

I hereby certify that the original of the foregoing Determination of Violation, Compliance Order, and Notice of Right to Request a Hearing was filed with the Regional Hearing Clerk, Region 9, and that a copy was sent, along with a copy of 40 C.F.R. Part 22 Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, certified mail, return receipt requested, to:

Mr. Malcom Currie  
Chief Executive Officer  
Hughes Aircraft Company  
7200 Hughes Terrace  
Los Angeles, CA 90045

7/31/92

Date

Mark Baw

Hazardous Waste Management Division

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**RECORDS  
SEPARATOR  
PAGE**

**RECORDS SEPARATOR PAGE**

**RECORDS SEPARATOR PAGE      RECORDS SEPARATOR PAGE**

COMMUNICATION STRATEGY  
Hughes Aircraft Enforcement Action

EPA Issuance of RCRA 3008(a) ORDER  
To Hughes Aircraft Company,  
3100 West Lomita Boulevard  
Torrance, California 90509

Date of Action: Tentative April 24, 1992.

Action:

EPA will issue a RCRA 3008(a) order to Hughes Aircraft Company (HAC), 3100 West Lomita Boulevard, Torrance, CA 90509

Brief Background:

HAC manufactures and processes electronic components for aerospace and defense industries. The legal owner has been Bard College since 1967 when HAC began operations there. The College has refused to sign the Part B permit application and the 1992 Revised Part A. The HAC site is located over two aquifers, the Gage and the Lynwood, that are used for local drinking water. The closest municipal supply well is 1.75 miles northwest of the site and is located in the City of Torrance. This well serves 100,000 people. Another well located 4 miles southeast and operated by the Dominguez Water Company also serves 100,000 people.

A RCRA Preliminary Assessment was conducted in May, 1990 and reported that contaminated subsoil was present based on a series of tests run in July, 1983.

The facility operates under Interim Status and is a large quantity hazardous waste generator, treatment, and storage facility. Hughes cannot get a permit for operations because Bard College has refused to sign the permit application.

RWQCB and the Torrance Fire Department have overseen the removal of underground fuel and solvent tanks at the facility. RWQCB also regulated the operation of two injection wells prior to 1/19/85. SCAQMD has issued permits for tanks and process areas. The Los Angeles County Sanitation District No. 13 has issued discharge permits for wastewater treatment and a cooling tower blow down.

HAC is currently listed on the California Bond Expenditure Plan.

The most recent inspection was conducted in April, 1990 by California Department of Health Services. No violations were cited.

The violations cited in this enforcement action (see "nuggets") were identified during an RFA (RCRA Facility Assessment) in 1991.

Key Outreach "Nuggets":

1. The facility failed to properly close 2 hazardous waste storage tanks and 2 hazardous drum storage areas. The facility failed to get required regulatory agency approval of proposed closure activities.
2. After improperly closing the above units, unacceptable levels of solvent were left in soils on-site.
3. The facility replaced the improperly closed storage areas with new above ground tanks and drum storage areas without first obtaining regulatory agency approval.

Public Interest: High. Hughes, Torrance is located in a low-socioeconomic area. It is located 110 feet above two major aquifers that are and within 2 miles of densely populated areas.

Project Officer:	Periann Wood, H-4-3 , 744-2109
Section Chief :	Jane Diamond, H-4-3 , 744-2139
Attorney :	Greg Lind, RC-3-2 , 744-1320
Congressional :	Sunny Nelson, E-1, 744-1560
Public Affairs :	David Schmidt E-2, 744-1578

Region 9 Communication Strategy: Issuance of RCRA 3008(a) Complaint to  
Hughes Aircraft Company, 3100 West Lomita Boulevard, Torrance, CA90509

Projected Announcement Date: 4/24/92

Materials to be Created:

"A" 3008(a) order for Hughes Aircraft Co.  
"B": Cover Letter to Hughes Aircraft Co.  
"C" Press Release  
"D": Penalty Calculations  
"E": Internal Agency Memo

By Whom:

Periann Wood  
Periann Wood  
David Schmidt  
Periann Wood  
Periann Wood

Note: For a complaint, day "0" begins the day EPA confirms receipt  
of the action document by the facility.

---

= AUDIENCE =                      = TIMING =   STAFFER =   METHOD                      = MATERIALS =

---

RCRA FACILITY/MANAGEMENT:  
(For RCRA complaint)

Dr. Malcolm P. Currie	-1	Brownlee	Fed Exp+Cert Mail	A,B
CEO - Hughes Aircraft Company	0	Wood	Phone-verify receipt	

[NOTE:Specify Federal Express Next Day Delivery by 10 am]

RCRA FACILITY/STAFF:

Paul Mahlow, Operating Manager	-1	Brownlee	Mail	A,B
Hughes Aircraft Company				

MEDIA:

State of California	0	Schmidt	PR Newswire	C
Waste Publications List	0	Schmidt	Mail	C

FEDERAL ELECTED OFFICIALS:

Rep. Dana Rohrabacher	0	Nelson	Phone/Fax	A,B
Sens. Alan Cranston and John Seymour	0	Nelson	Fax	A,B

FEDERAL AGENCIES:  
None

STATE ELECTED OFFICIALS:

Gerald Felando, Assembly	-1	Brownlee	Mail	A,B
Sen. Robert Beverly	-1	Brownlee	Mail	A,B

Assembly Environment Safety and Toxic Materials Committee	-1	Brownlee	Mail	A, B
Sen. Art Torres	-1	Brownlee	Mail	A, B
Assemblywoman Sally Tanner	-1	Brownlee	Mail	A, B
Chair Assembly Environment Safety and Toxic Materials Committee				

STATE AGENCIES:

Arthur Heath	-1	Brownlee	Mail	A, B
California Regional Water Quality Control Board				

Paula Rasmussen, Chief	-1	Diamond	Phone	
Surveillance and Enforcement	-1	Brownlee	Mail	A, B

Mohinder Sandhu, Chief	-1	Brownlee	Mail	A, B
Permitting				

Senate Toxics and Public Safety Management Committee	-1	Brownlee	Mail	A, B
--	----	----------	------	------

LOCAL AGENCIES:

Inspector Doug Bergen	-1	Brownlee	Mail	A, B
City of Torrance Fire Department				

LOCAL ELECTED OFFICIALS:

Mayor Katie Geissert	-1	Brownlee	Mail	A, B
----------------------	----	----------	------	------

PUBLIC AFFAIRS:

Robin Woods, HdQ/OPA	0	Schmidt	email	C
Bob Borzelleri, CDHS, Sacramento	0	Schmidt	Fax	C

PUBLIC INTEREST GROUPS:

EPA OFFICES:

R9 Library Information Center	-1	Wood	Brief	C
R9 RCRA Information Line	-1	Wood	Brief	C
Bob Small, OS-520	-1	Brownlee	Mail	A, B, D
Kenda Layne, OS-520	-1	Brownlee	Mail	A, B
Elaine Schimmel, H-4-1	-1	Brownlee	Mail	A, B, D, E

## Address and Phone List

Assembly Environment Safety and Toxic Materials Committee  
11100 Valley Blvd., #106  
El Monte, CA 91073  
Fax (213) 575-70461

Inspector Doug Bergen  
City of Torrance Fire Department  
3010 Torrance Blvd.  
Torrance, CA 90503  
(310)-781-7042

Senator Robert G. Beverly  
1611 S. Pacific Highway, #102  
Redondo Beach, CA 90277  
(213) 540-1611  
or  
5082 Capitol Building  
Sacramento, CA  
7200 Hughes Terrace  
Westchester, CA 90045-0066  
(310) 568-7808

Dr. Malcolm P. Currie  
CEO - Hughes Aircraft  
7200 Hughes Terrace  
Westchester, CA 90045-0066

Assemblyman Gerald Felando  
3838 Carson Street, #110  
Torrance, CA 90503  
Fax (213) 516-4117  
or  
5155 Capitol Building  
Sacramento, CA

Mayor Katie Geissert  
3031 Torrance Blvd.  
Torrance, CA 90503

Arthur Heath  
California Regional Water Quality Control Board  
Los Angeles Region  
101 Centre Plaza Drive  
Monterey Park, CA 91754-2156  
(213) 266-7563

Paul Mahlow  
Hughes Aircraft Company  
3100 W. Lomita Blvd.  
Torrance, CA 90509  
(310) 517-6813

Paula Rasmussen, Chief Surveillance and Enforcement  
Cal-EPA, Region 4  
245 W.Broadway, Suite 350  
Long Beach CA 90802  
(213) 590-4868

Congressman Dana Rohrabaker  
2733 Pacific Coast Highway  
Torrance, CA 90505  
(213)-325-0668

Mohinder Sandhu, Chief  
Permitting  
Cal-EPA, Region 4  
245 W.Broadway, Suite 350  
Long Beach, CA 90802  
(213) 590-4727

Assemblywoman Sally Tanner  
Chair Assembly Environment Safety and Toxic Materials Committee  
11100 Valley Blvd., #106  
El Monte, CA 91731  
Fax (213) 575-7046  
Fax (213) 575-70461

Sen. Art Torres  
Chairman Senate Toxics and Public Safety Management Committee  
1075 S.Broadway, #2105  
Los Angeles, CA 90012  
FAX (213) 617-0077

Senate Toxics and Public Safety Management Committee  
1075 S.Broadway, #2105  
Los Angeles, CA 90012  
Fa (213) 617-0077



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SEPARATOR  
PAGE**

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P 347 528 560

**RECEIPT FOR CERTIFIED MAIL**

NO INSURANCE COVERAGE PROVIDED  
NOT FOR INTERNATIONAL MAIL

(See Reverse)

U.S.G.P.O. 1989-234-585

PS Form 3800, June 1985

Sent to <b>Mr. Michael Yalch</b>	
Street & No. <b>Hughes Aircraft Company 3100 West Lomita Boulevard</b>	
P.O., State & ZIP Code <b>Torrance, CA 90509</b>	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date <b>7/31/92</b>	

P 887 519 248



**Certified Mail Receipt**

No Insurance Coverage Provided

Do not use for International Mail

(See Reverse)

PS Form 3800, June 1990

Sent to <b>Mr. Malcom Currie</b>	
Street & No. <b>7200 Hughes Terrace</b>	
P.O., State & ZIP Code <b>Los Angeles, CA 90045</b>	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Address of Delivery	
TOTAL Postage & Fees	\$
Postmark or Date <b>7/31/92</b>	



## Environmental News

FOR IMMEDIATE RELEASE: August 4, 1992

Contact: Dave Schmidt, U.S. EPA  
(415) 744-1578

### U.S. EPA CITES HUGHES AIRCRAFT FOR WASTE VIOLATIONS

(San Francisco)--The U.S. Environmental Protection Agency (U.S. EPA) today announced that it has filed a complaint against Hughes Aircraft Co. charging hazardous waste violations at the firm's electronics manufacturing plant at 3100 West Lomita Blvd., Torrance, Calif., and proposing a penalty of \$381,150.

The facility is charged with failing to get U.S. EPA or state of California approval, and failing to follow proper procedures, for the closure, removal, and replacement of two leaking underground hazardous waste storage tanks and two waste drum storage areas. Soils and groundwater beneath the underground tanks were found to be contaminated with solvents.

Under RCRA, the federal Resource Conservation and Recovery Act, which governs management of hazardous wastes, prior approval of waste storage closure plans is mandatory.

Soil and groundwater contamination is a serious concern at the Hughes plant due to the potential for the contaminants to pollute drinking water. Currently, the contamination is confined to the plant site. The Regional Water Quality Control Board is requiring Hughes to pump and treat the contaminated groundwater before it spreads further. The nearest well drawing clean municipal water supplies is about two miles from the plant, and another is located four miles from it. Each of the wells provides water for about 100,000 people.

In addition to paying the penalty, the complaint requires Hughes Aircraft to certify compliance with all applicable permit requirements for the new hazardous waste storage facilities.

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NCC IBM JES NEWS SHEET

THIS PAGE CONTAINS CURRENT NEWS ITEMS TO INFORM USERS  
OF CHANGES ON THE NCC IBM SYSTEM.

J E S     N E W S

WELCOME TO THE LATEST  
NCC PRODUCTION SYSTEM

IN MAY 1991, THE ENVIRONMENTAL PROTECTION AGENCY PRINTED OVER  
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WHAT CAN YOU DO TO REDUCE PRINTED OUTPUT WITHIN THE AGENCY?

\*\*\* CURRENT NEWS ALERTS \*\*\*

91/10/04 ADABAS V5.1.8 INSTALLATION POSTPONED	- SEE NEWS ALERT10
91/10/04 A LIST OF RECENTLY RELEASED EPA MEMOS ✓	- SEE NEWS ALERT3
91/10/01 PHOENIX COURSES UNAVAILABLE	- SEE NEWS ALERT1
91/09/30 HSM EXPLICIT ARCHIVE TO ASM2 (UPDATE)	- SEE NEWS ALERT2
91/09/25 INSTALLATION OF RACF VERSION 1.9	- SEE NEWS ALERT7
91/09/25 PLSORT RELEASE 6.3E AVAILABLE FOR TESTING	- SEE NEWS ALERT6
91/09/17 FOCUS DATA DICTIONARY RELEASE 3.0.2 ✓	- SEE NEWS ALERT4

Date: 911007 Time: 105017 IDEA File Output From Interactive Scroll

Scroll Command: PRINTO 1 54 MBQE D(R75)

Contents of Query at Time of Print

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/* 911007 1044 NAMES SEARCH FOUND          55 NAMES. */
/* NAME: HUGHES AIRCRAFT CORP. */
/* STC: CA */
OUTPUT REPORT 1A REPORT 1B
INPUT LINKED
SELECT FIN.EPID=
CAD041666819, /* HUGHES AIRCRAFT (AFS) */
/* 3100 W. LOMITA BLVD */
/* TORRANCE CA 09 037 */
/* HUGHES AIRCRAFT CO. (AFS) */
/* 3100 LOMITA BLVD. */
/* TORRANCE CA 09 037 */
/* HUGHES AIRCRAFT CO (CER) */
/* 3100 W LOMITA BLVD */
/* TORRANCE CA 09 037 */
/* HUGHES AIRCRAFT CO. ELECTRON DYNAMICS DIV. (TRI) */
/* 3100 LOMITA BLVD. */
/* TORRANCE CA 90509 09 037 */
/* HUGHES AIRCRAFT CO. ELECTRON DYNAMICS DIV. (TRI) */
/* 3100 W. LOMITA BLVD. */
/* TORRANCE CA 90509 09 037 */
/* HUGHES AIRCRAFT COMPANY (HWD) */
/* 3100 W LOMITA BLVD */
/* TORRANCE CA 09 037 */
/* HUGHES AIRCRAFT COMPANY ELECTRON DYNAMICS DIV (DUN) */
/* 3100 LOMITA BLVD */
/* TORRANCE CA 90505 09 037 */
```

U.S. ENVIRONMENTAL PROTECTION AGENCY  
 ENFORCEMENT CONFIDENTIAL - FOR EPA INTERNAL USE ONLY  
 INTEGRATED DATA FACILITY-SPECIFIC COMPLIANCE PROFILE REPORT

1B

FINDS Id: CAD041666819 Fac. Name: HUGHES AIRCRAFT COMPANY ELECTR City: TORRANCE

State: CA

AIR FACILITY SUBSYSTEM (AFS) SUMMARY

CDS Plant ID: 603700269 Plant Name: HUGHES AIRCRAFT Address: 3100 W. LOMITA BLVD  
 City: TORRANCE County: 037 State: CALIFORNIA  
 Primary SIC Code: 3673 Secondary SIC Code: 0 EPA Classification Code: A2 Govt. Facility Code Desc:  
 Sign.Viol.Flag 1: Sign.Viol.Flag 2: Sign.Viol.Flag 3: Sign.Viol.Flag 4:  
 Plant Compliance Status: IN COMPLIANCE - INSPECTION

Air Program: SIP SOURCE

Plant Historical	FY/QTR	Plant Compliance Status	FY/QTR	Plant Compliance Status
Compliance Status:	03/89	IN COMPLIANCE - INSPECTION	04/89	IN COMPLIANCE - INSPECTION
	01/90	IN COMPLIANCE - INSPECTION	02/90	IN COMPLIANCE - INSPECTION
	04/90	IN COMPLIANCE - INSPECTION	01/91	IN COMPLIANCE - INSPECTION
	02/91	IN COMPLIANCE - INSPECTION	03/91	IN COMPLIANCE - INSPECTION

Pollutant	Pollutant	Compliance Status	Status	Attain/Nonattain
PT	3	A2	N	
PX	3	A2	A	
Pl	3	A2	N	

National Actions Description

Date Achieved	Penalty Amount
03/28/86	
03/27/87	
03/29/88	
03/31/89	
02/06/90	

STATE INSPECTION

STATE INSPECTION

STATE INSPECTION

STATE INSPECTION

STATE INSPECTION

----- AFS Overall Summary -----

AFS CDS Plant ID:	Plant Name:	Year	No.Insp.	No.	NOVs	No.Adm.Act.	No.J Act.
603700269	HUGHES AIRCRAFT	1989	1	0	0	0	0
Source Compl. Status	Air Program Desc. Qtrly Compl Status	1990	1	0	0	0	0
IN COMPLIANCE - INSPECTION	SIP SOURCE 33333333	1991	1	0	0	0	0

AIR FACILITY SUBSYSTEM (AFS) SUMMARY

CDS Plant ID: 603780269 Plant Name: HUGHES AIRCRAFT CO. Address: 3100 LOMITA BLVD.  
 City: TORRANCE County: 037 State: CALIFORNIA  
 Primary SIC Code: 3728 Secondary SIC Code: 0 EPA Classification Code: A1 Govt. Facility Code Desc:  
 Sign.Viol.Flag 1: Sign.Viol.Flag 2: Sign.Viol.Flag 3: Sign.Viol.Flag 4:  
 Plant Compliance Status: IN COMPLIANCE - INSPECTION

Air Program: NESHAP

Plant Historical	FY/QTR	Plant Compliance Status	FY/QTR	Plant Compliance Status
Compliance Status:	03/89	IN COMPLIANCE - INSPECTION	04/89	IN COMPLIANCE - INSPECTION
	01/90	IN COMPLIANCE - INSPECTION	02/90	IN COMPLIANCE - INSPECTION
	04/90	IN COMPLIANCE - INSPECTION	01/91	IN COMPLIANCE - INSPECTION
	✓ 02/91	IN COMPLIANCE - INSPECTION	03/91	IN COMPLIANCE - INSPECTION

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
TOXIC RELEASE INVENTORY SYSTEM  
YEAR-TO-YEAR RELEASE/TRANSFER COMPARISON REPORT

10/07/91  
10:48:57

TRI FACILITY ID: 90509HGHSR3100W \*\*\* NOTE: HISTORY RECORDS EXIST - THE NAME/ADDRESS INFO MAY BE DIFFERANT FOR PREVIOUS YEAR  
FACILITY NAME : HUGHES AIRCRAFT CO. ELECTRON DYNAMICS DIV.  
ADDRESS : 3100 LOMITA BLVD.  
TORRANCE CA 90509

CHEMICAL: FREON 113

	1987	1988	% OF CHANGE	1989	% OF CHANGE	1990	% OF CHANGE	1991	% OF CHANGE
	-----	-----	-----	-----	-----	-----	-----	-----	-----
# OF SUBMISSIONS	1	1		0		0		0	
RELEASES									
FUGITIVE AIR	8400	33580	+299	0		0		0	
STACK AIR	1	1200	+119900	0		0		0	
WATER	0	0		0		0		0	
UNDERGROUND	0	0		0		0		0	
LAND	0	0		0		0		0	
TOTAL RELEASES	8401	34780	+313	0		0		0	
TRANSFERS									
POTW	0	0		0		0		0	
OFF SITE	32900	0		0		0		0	
TOTAL TRANSFER	32900	0		0		0		0	

THE PERCENT CHANGE WILL BE CALCULATED ONLY IF BOTH APPLICABLE REPORTING YEARS ARE GREATER THAN ZERO.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
TOXIC RELEASE INVENTORY SYSTEM  
YEAR-TO-YEAR RELEASE/TRANSFER COMPARISON REPORT

10/07/91  
10:48:20

TRI FACILITY ID: 90509HGHSR3100W \*\*\* NOTE: HISTORY RECORDS EXIST - THE NAME/ADDRESS INFO MAY BE DIFFERANT FOR PREVIOUS YEAR  
FACILITY NAME : HUGHES AIRCRAFT CO. ELECTRON DYNAMICS DIV.  
ADDRESS : 3100 LOMITA BLVD.  
TORRANCE CA 90509

CHEMICAL: 1,1,1-TRICHLOROETHANE

	1987	1988	% OF CHANGE	1989	% OF CHANGE	1990	% OF CHANGE	1991	% OF CHANGE
	-----	-----	-----	-----	-----	-----	-----	-----	-----
# OF SUBMISSIONS	0	1		0		0		0	
RELEASES									
FUGITIVE AIR	0	6894		0		0		0	
STACK AIR	0	1378		0		0		0	
WATER	0	0		0		0		0	
UNDERGROUND	0	0		0		0		0	
LAND	0	0		0		0		0	
TOTAL RELEASES	0	8272		0		0		0	
TRANSFERS									
POTW	0	0		0		0		0	
OFF SITE	0	0		0		0		0	
TOTAL TRANSFER	0	0		0		0		0	

THE PERCENT CHANGE WILL BE CALCULATED ONLY IF BOTH APPLICABLE REPORTING YEARS ARE GREATER THAN ZERO.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
TOXIC RELEASE INVENTORY SYSTEM  
YEAR-TO-YEAR RELEASE/TRANSFER COMPARISON REPORT

10/07/91  
10:49:17

TRI FACILITY ID: 90509HGHSR3100W \*\*\* NOTE: HISTORY RECORDS EXIST - THE NAME/ADDRESS INFO MAY BE DIFFERANT FOR PREVIOUS YEAR  
FACILITY NAME : HUGHES AIRCRAFT CO. ELECTRON DYNAMICS DIV.  
ADDRESS : 3100 LOMITA BLVD.  
TORRANCE CA 90509

CHEMICAL: METHANOL

	1987	1988	% OF CHANGE	1989	% OF CHANGE	1990	% OF CHANGE	1991	% OF CHANGE
	-----	-----	-----	-----	-----	-----	-----	-----	-----
# OF SUBMISSIONS	0	1		0		0		0	
RELEASES									
FUGITIVE AIR	0	4843		0		0		0	
STACK AIR	0	13118		0		0		0	
WATER	0	0		0		0		0	
UNDERGROUND	0	0		0		0		0	
LAND	0	0		0		0		0	
TOTAL RELEASES	0	17961		0		0		0	
TRANSFERS									
POTW	0	0		0		0		0	
OFF SITE	0	0		0		0		0	
TOTAL TRANSFER	0	0		0		0		0	

THE PERCENT CHANGE WILL BE CALCULATED ONLY IF BOTH APPLICABLE REPORTING YEARS ARE GREATER THAN ZERO.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
TOXIC RELEASE INVENTORY SYSTEM  
YEAR-TO-YEAR RELEASE/TRANSFER COMPARISON REPORT

10/07/91  
10:49:34

TRI FACILITY ID: 90509HGHSR3100W \*\*\* NOTE: HISTORY RECORDS EXIST - THE NAME/ADDRESS INFO MAY BE DIFFERANT FOR PREVIOUS YEAR  
FACILITY NAME : HUGHES AIRCRAFT CO. ELECTRON DYNAMICS DIV.  
ADDRESS : 3100 LOMITA BLVD.  
TORRANCE CA 90509

CHEMICAL: SULFURIC ACID

	1987	1988	% OF CHANGE	1989	% OF CHANGE	1990	% OF CHANGE	1991	% OF CHANGE
# OF SUBMISSIONS	0	1		0		0		0	
RELEASES									
FUGITIVE AIR	0	250		0		0		0	
STACK AIR	0	250		0		0		0	
WATER	0	0		0		0		0	
UNDERGROUND	0	0		0		0		0	
LAND	0	0		0		0		0	
TOTAL RELEASES	0	500		0		0		0	
TRANSFERS									
POTW	0	0		0		0		0	
OFF SITE	0	0		0		0		0	
TOTAL TRANSFER	0	0		0		0		0	

THE PERCENT CHANGE WILL BE CALCULATED ONLY IF BOTH APPLICABLE REPORTING YEARS ARE GREATER THAN ZERO.

\* some quantities for nitric acid (1988)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
TOXIC RELEASE INVENTORY SYSTEM  
YEAR-TO-YEAR RELEASE/TRANSFER COMPARISON REPORT

10/07/91  
10:49:47

TRI FACILITY ID: 90509HGHSR3100W \*\*\* NOTE: HISTORY RECORDS EXIST - THE NAME/ADDRESS INFO MAY BE DIFFERANT FOR PREVIOUS YEAR  
FACILITY NAME : HUGHES AIRCRAFT CO. ELECTRON DYNAMICS DIV.  
ADDRESS : 3100 LOMITA BLVD.  
TORRANCE CA 90509

CHEMICAL: SODIUM HYDROXIDE

	1987	1988	% OF CHANGE	1989	% OF CHANGE	1990	% OF CHANGE	1991	% OF CHANGE
	-----	-----	-----	-----	-----	-----	-----	-----	-----
# OF SUBMISSIONS	0	1		0		0		0	
RELEASES									
FUGITIVE AIR	0	250		0		0		0	
STACK AIR	0	250		0		0		0	
WATER	0	0		0		0		0	
UNDERGROUND	0	0		0		0		0	
LAND	0	0		0		0		0	
TOTAL RELEASES	0	500		0		0		0	
TRANSFERS									
POTW	0	0		0		0		0	
OFF SITE	0	0		0		0		0	
TOTAL TRANSFER	0	0		0		0		0	

THE PERCENT CHANGE WILL BE CALCULATED ONLY IF BOTH APPLICABLE REPORTING YEARS ARE GREATER THAN ZERO.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
TOXIC RELEASE INVENTORY SYSTEM  
YEAR-TO-YEAR RELEASE/TRANSFER COMPARISON REPORT

10/07/91  
10:48:40

TRI FACILITY ID: 90509HGHSR3100W \*\*\* NOTE: HISTORY RECORDS EXIST - THE NAME/ADDRESS INFO MAY BE DIFFERANT FOR PREVIOUS YEAR  
FACILITY NAME : HUGHES AIRCRAFT CO. ELECTRON DYNAMICS DIV.  
ADDRESS : 3100 LOMITA BLVD.  
TORRANCE CA 90509

CHEMICAL: ACETONE

	1987	1988	% OF CHANGE	1989	% OF CHANGE	1990	% OF CHANGE	1991	% OF CHANGE
# OF SUBMISSIONS	0	1		0		0		0	
RELEASES									
FUGITIVE AIR	0	6024		0		0		0	
STACK AIR	0	14457		0		0		0	
WATER	0	0		0		0		0	
UNDERGROUND	0	0		0		0		0	
LAND	0	0		0		0		0	
TOTAL RELEASES	0	20481		0		0		0	
TRANSFERS									
POTW	0	0		0		0		0	
OFF SITE	0	0		0		0		0	
TOTAL TRANSFER	0	0		0		0		0	

THE PERCENT CHANGE WILL BE CALCULATED ONLY IF BOTH APPLICABLE REPORTING YEARS ARE GREATER THAN ZERO.

MBQE  
MBQE

HH	HH	WW	WW	00000000	9999999999
HH	HH	WW	WW	0000000000	999999999999
HH	HH	WW	WW	00 0000	99 99
HH	HH	WW	WW	00 00 00	99 99
HH	HH	WW	WW	00 00 00	99 99
HHHHHHHHHHHHHH	WW	WW	WW	00 00 00	999999999999
HHHHHHHHHHHHHH	WW	WW	WW	00 00 00	999999999999
HH	HH	WW	WWWW	WW 00 00	00 99
HH	HH	WW	WW	WW WW 0000	00 99
HH	HH	WWWW	WWWW	000 00	99 99
HH	HH	WWW	WWW	0000000000	999999999999
HH	HH	WW	WW	00000000	9999999999

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      BBBBBBBBBBBB      QQQQQQQQQQ      EEEEEEEEEEEE
    BBBBBBBBBBBBBB    QQQQQQQQQQQQ    EEEEEEEEEEEE
      BB              BB    QQ          QQ    EE
    BB              BB    QQ          QQ    EE
      BB              BB    QQ          QQ    EE
    BBBBBBBBBBBB      QQ          QQ    EEEEEEEE
  BBBBBBBBBBBB      QQ          QQ    EEEEEEEE
    BB              BB    QQ          QQ    EE
      BB              BB    QQ          QQ    EE
    BB              BB    QQ          QQ    EE
      BB              BB    QQ          QQ    EE
    BBBBBBBBBBBBB    QQQQQQQQQQ    EEEEEEEEEEEE
  BBBBBBBBBBBBB    QQQQQQQQ  QQ    EEEEEEEEEEEE

```

TTTTTTTTTTTT	SSSSSSSSSS	UU	UU	11	6666666666	6666666666	9999999999	6666666666
TTTTTTTTTTTT	SSSSSSSSSSSS	UU	UU	111	666666666666	666666666666	999999999999	666666666666
TT	SS	SS	UU	111	66	66	99	66
TT	SS		UU	11	66	66	99	66
TT	SSS		UU	11	66	66	99	66
TT	SSSSSSSSSS	UU	UU	11	6666666666	6666666666	999999999999	666666666666
TT	SSSSSSSSSS	UU	UU	11	666666666666	666666666666	999999999999	666666666666
TT		SSS	UU	11	66	66	99	66
TT		SS	UU	11	66	66	99	66
TT	SS	SS	UU	11	66	66	99	66
TT	SSSSSSSSSSSS	UUUUUUUUUUUU		1111111111	666666666666	666666666666	999999999999	666666666666
TT	SSSSSSSSSS	UUUUUUUUUUUU		1111111111	6666666666	6666666666	9999999999	6666666666

MBQE	A	START	TSU16696	BQE	QUACH.BUU	ACCT	HW09	11.41.01	AM	07	OCT	91	TSOINRDR	R75.PR1	EPA2	BIN	MBQE	MBQE
MBQE	A	START	TSU16696	BQE	QUACH.BUU	ACCT	HW09	11.41.01	AM	07	OCT	91	TSOINRDR	R75.PR1	EPA2	BIN	MBQE	MBQE
MBQE	A	START	TSU16696	BQE	QUACH.BUU	ACCT	HW09	11.41.01	AM	07	OCT	91	TSOINRDR	R75.PR1	EPA2	BIN	MBQE	MBQE
MBQE	A	START	TSU16696	BQE	QUACH.BUU	ACCT	HW09	11.41.01	AM	07	OCT	91	TSOINRDR	R75.PR1	EPA2	BIN	MBQE	MBQE
MBQE	A	START	TSU16696	BQE	QUACH.BUU	ACCT	HW09	11.41.01	AM	07	OCT	91	TSOINRDR	R75.PR1	EPA2	BIN	MBQE	MBQE
MBQE	A	START	TSU16696	BQE	QUACH.BUU	ACCT	HW09	11.41.01	AM	07	OCT	91	TSOINRDR	R75.PR1	EPA2	BIN	MBQE	MBQE

NCC IBM JES NEWS SHEET

THIS PAGE CONTAINS CURRENT NEWS ITEMS TO INFORM USERS  
OF CHANGES ON THE NCC IBM SYSTEM.

J E S     N E W S

WELCOME TO THE LATEST  
NCC PRODUCTION SYSTEM

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\*\*\* CURRENT NEWS ALERTS \*\*\*

91/10/04 ADABAS V5.1.8 INSTALLATION POSTPONED	- SEE NEWS ALERT10
91/10/04 A LIST OF RECENTLY RELEASED EPA MEMOS	- SEE NEWS ALERT3
91/10/01 PHOENIX COURSES UNAVAILABLE	- SEE NEWS ALERT1
91/09/30 HSM EXPLICIT ARCHIVE TO ASM2 (UPDATE)	- SEE NEWS ALERT2
91/09/25 INSTALLATION OF RACF VERSION 1.9	- SEE NEWS ALERT7
91/09/25 PLSORT RELEASE 6.3E AVAILABLE FOR TESTING	- SEE NEWS ALERT6
91/09/17 FOCUS DATA DICTIONARY RELEASE 3.0.2	- SEE NEWS ALERT4

Date: 911007 Time: 105041 IDEA File Output From Interactive Scroll

Scroll Command: PRINTO 1 39 MBQE D(R75)

Contents of Query at Time of Print

```
/* 911007 1044 NAMES SEARCH FOUND          55 NAMES. */
/* NAME: HUGHES AIRCRAFT CORP. */
/* STC: CA */
OUTPUT REPORT 1A REPORT 1B
INPUT LINKED
SELECT FIN.EPID=
CAD041666819, /* HUGHES AIRCRAFT (AFS) */
/* 3100 W. LOMITA BLVD */
/* TORRANCE CA 09 037 */
/* HUGHES AIRCRAFT CO. (AFS) */
/* 3100 LOMITA BLVD. */
/* TORRANCE CA 09 037 */
/* HUGHES AIRCRAFT CO (CER) */
/* 3100 W LOMITA BLVD */
/* TORRANCE CA 09 037 */
/* HUGHES AIRCRAFT CO. ELECTRON DYNAMICS DIV. (TRI) */
/* 3100 LOMITA BLVD. */
/* TORRANCE CA 90509 09 037 */
/* HUGHES AIRCRAFT CO. ELECTRON DYNAMICS DIV. (TRI) */
/* 3100 W. LOMITA BLVD. */
/* TORRANCE CA 90509 09 037 */
/* HUGHES AIRCRAFT COMPANY (HWD) */
/* 3100 W LOMITA BLVD */
/* TORRANCE CA 09 037 */
/* HUGHES AIRCRAFT COMPANY ELECTRON DYNAMICS DIV (DUN) */
/* 3100 LOMITA BLVD */
/* TORRANCE CA 90505 09 037 */
```



U.S. ENVIRONMENTAL PROTECTION AGENCY  
ENFORCEMENT CONFIDENTIAL - FOR EPA INTERNAL USE ONLY  
INTEGRATED DATA FACILITY-SPECIFIC COMPLIANCE PROFILE REPORT

10/07/91 Page 1

1A

FINDS Id: CAD041666819 Fac. Name: HUGHES AIRCRAFT COMPANY ELECTR City: TORRANCE

State: CA

AFS CDS Plant ID: 603700269	Plant Name: HUGHES AIRCRAFT	Year	No. Insp.	No.	NOVs	No. Adm. Act.	No. J Act.
Source Compl. Status	<u>Air Program Desc.</u> Qtrly Compl Status	1989	1		0	0	0
IN COMPLIANCE - INSPECTION	<u>SIP SOURCE</u> 33333333	1990	1		0	0	0
		1991	1		0	0	0

AFS CDS Plant ID: 603780269	Plant Name: HUGHES AIRCRAFT CO.	Year	No. Insp.	No.	NOVs	No. Adm. Act.	No. J Act.
Source Compl. Status	<u>Air Program Desc.</u> Qtrly Compl Status	1989	1		0	0	0
IN COMPLIANCE - INSPECTION	<u>NESHAP</u> 33333333	1990	1		0	0	0
		1991	1		0	0	0

CERCLIS Site Name: HUGHES AIRCRAFT CO Cal Year 1988 1989 1990 1991

NPL Status: N	No. Admin. Actions:	0	0	0	0
Site Classification: ND	No. Judic. Actions:	0	0	0	0

TRI Id: 90509HGHSR3100W Facility Name: HUGHES AIRCRAFT CO. ELECTRON D

YR	Chem Count Lbs:NP Air	Pt Air	Water	UG Inj.	Land	POTW	Off-Site	Total
1987	2	8400	1	0	0	0	32900	41301
1988	6	51341	30153	0	0	0	0	81494

TRI Id: 90509LCTRN3100W Facility Name: HUGHES AIRCRAFT CO. ELECTRON D

YR	Chem Count Lbs:NP Air	Pt Air	Water	UG Inj.	Land	POTW	Off-Site	Total
1987	7	30800	25966	0	0	0	47400	104166
1989	4	64207	16948	0	0	0	0	81155

✓ HWDMS Facility Name: HUGHES AIRCRAFT COMPANY Year

TSD Fac. Status	1	TSD Fac. Type: S HPV?	NO	CY89	No. Eval.	No. NOVs	No. Adm. Act.	No. J Act.
RCRA Per./App.Sta.: 1	Owner Oper. Type: P			CY89	1	2	0	0
				CY90	3	1	1	0
				CY91	0	0	0	0

DUNS Number: 8390910 Name: HUGHES AIRCRAFT COMPANY BRANCH NOT SUB Lev1 3 Ult: 5356613 SIC: 3812 0 0

[illegible]